

**Equality and
Human Rights
Commission**

Annual report and accounts 2021–22



Equality and Human Rights Commission

Annual report and accounts

1 April 2021–31 March 2022

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Accounts presented to Parliament pursuant to paragraph 40 of Schedule 1 to the Equality Act 2006.

Ordered by the House of Commons to be printed on 14 July 2022.

Further information about the Equality and Human Rights Commission is available on our website **equalityhumanrights.com**

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The Equality and Human Rights Commission was established under the Equality Act 2006, and our statutory powers and duties are described in the 2006 Equality Act.

This annual report and accounts covers our work from 1 April 2021 to 31 March 2022. It includes details of the work we carried out during this period in line with our business plan.

It also includes our accounts for the financial period prepared in accordance with the Government Financial Reporting Manual (FRoM). The accounts are prepared on an accruals basis under International Financial Reporting Standards (IFRS).

Further information about us is available on our website equalityhumanrights.com.

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Foreword from our Chairwoman

In my first full year as Chairwoman of the Equality and Human Rights Commission (EHRC) – and our second year operating under COVID-19 – I am pleased to report that we have continued to deliver on equality and human rights for the people of Britain, while also reshaping our organisation to meet society's future needs and challenges.



It is our job, as an independent statutory body, to ensure that all people in our society are treated fairly and justly, using our unique regulatory powers to produce change that makes a real difference to people's lives.

From our landmark legal fund supporting victims of race discrimination to binding legal agreements that protect staff at work from sexual harassment, we have used our powers to change behaviour, improve practices and right wrongs. We reflect on this work in our performance report.

All of these activities have taken place against the backdrop of the second full year of the COVID-19 pandemic. While communities, families, schools and businesses across Britain began to rebuild after one of the most difficult periods in our history, we kept equality and human rights considerations at the forefront of decisions about the response to COVID and proposals to rebuild out of the pandemic.

At the same time, we also embarked on a significant transformation of our own – refocusing the EHRC on our core purpose as a regulator of equality and human rights, while reviewing our functional structure, our leadership and culture and our future ways of working as we embrace post-pandemic opportunities.

I am grateful for the dedication of everyone who works for us and I want to thank them for their performance over the last 12 months. Our refreshed Board, with new arrivals, brings fresh thinking to our renewed purpose, but we also offer our gratitude to departing Commissioners, Lord Ribeiro, Susan Johnson, Suzanne Baxter, Pavita Cooper and Mark McLane, and wish them well in their next roles. Our new Chief Executive, Marcial Boo, leads the organisation with a clarity of vision, combining a wealth of regulatory experience with a passion for equality and human rights.

As we embark on the first year of our new strategic plan for 2022–25, we recognise that there is still much to do in securing ongoing improvements in equality and human rights laws. Moreover, in enforcing laws and standards, we are determined to play our part in improving relations between our disparate stakeholders, balancing rights where necessary, helping to improve understanding and, therefore, the conduct of public debate on contentious issues.

Looking ahead, I am confident that the EHRC will continue to address the challenges that face our society, with the same vigorous commitment to protecting and advancing equality and human rights as we have done since our establishment.

Baroness Kishwer Falkner,
Chairwoman

Foreword from our Chief Executive

In 2021–22, the final year of our last three-year strategy period, the EHRC continued to make a positive impact in our enforcement of equality law and human rights standards in Britain.



We supported legal cases where people had been discriminated against because of their race, religion or belief, sex and sexual orientation. We provided guidance to employers to reduce sexual harassment and gender pay gaps. And we took action to protect the rights of older people and disabled people accessing services in person and online. You will read more details in this report. We also conducted all the detailed legal work and consultation with stakeholders that led to the publication of our guidance on single-sex spaces and services at the beginning of April 2022.

Some of this work involved high-profile cases against prominent firms and public bodies. But much of our work is below the public radar: seeking evidence, listening to stakeholders, identifying problems, influencing policy and taking a range of

regulatory action to enforce the law and promote equality and human rights. We always act fairly, with independence, authority and integrity, and with the intention of fostering good relations between individuals and groups across Britain.

I feel privileged to be leading the EHRC into its new three-year strategy period, working closely with our Chairwoman, Baroness Kishwer Falkner, and our Board of Commissioners. I am grateful to them and to our executive directors, Alastair Pringle, Melanie Field and Cath Denholm, who led the EHRC in the first half of the year before my arrival in September 2021. I thank all

the EHRC's staff for their continued support for each other and for their work through the year. I am grateful too to all those individuals and organisations who continue valiantly to champion equality and human rights in thousands of ways, whether in charities, public bodies, private firms, or in governments and parliaments in England, Scotland and Wales. I look forward to working with you all to tackle inequality and ensure that everyone in Britain gets a fair chance in life.

Marcial Boo,
Chief Executive

Who we are and what we do

Our duties and powers

We are Britain's equality and human rights regulator, with our human rights mandate in Scotland extending to matters reserved to the UK Parliament. The Scottish Human Rights Commission has a mandate to promote and protect human rights in Scotland that fall within the jurisdiction of the Scottish Parliament.

The [Equality Act 2006](#) sets out our duties, powers and governance. It defines our **general duty** as encouraging and supporting the development of a society in which:

- people's ability to achieve their potential is not limited by prejudice or discrimination
- there is respect for and protection of each individual's human rights
- there is respect for the dignity and worth of each individual
- each individual has an equal opportunity to participate in society, and
- there is mutual respect between groups based on understanding and valuing of diversity and on shared respect for equality and human rights.

Our **powers** include:

- providing legal assistance to those taking legal action related to equality
- taking or intervening in legal cases related to equality and human rights
- taking legal action through the court if we think it likely that an organisation will commit an unlawful act
- conducting inquiries, investigations and assessments to examine the behaviour of institutions
- enforcing the **Public Sector Equality Duty** and issuing compliance notices where we believe the law has been broken
- providing education and training so that individuals and institutions know their rights and responsibilities
- producing guidance to support individuals and organisations to follow the law and promote good practice, and
- making grants to others.

We use our powers and influence to protect, enforce and promote equality and human rights laws and standards across England, Scotland and Wales.

We enforce the [Equality Act 2010](#), which makes it unlawful to discriminate against or harass individuals based on **nine protected characteristics**:



1 | age



2 | disability



3 | gender reassignment



4 | marriage and civil partnership



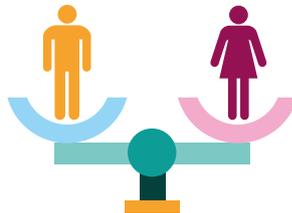
5 | pregnancy and maternity



6 | race



7 | religion or belief



8 | sex



9 | sexual orientation.

We are a United Nations accredited '**A status**' **National Human Rights Institution**. This means that we have been assessed as meeting the required standards for effective and credible National Human Rights Institutions as set out under the [United Nations Paris Principles](#).

As a National Human Rights Institution, we promote awareness, understanding and protection of human rights, encouraging public bodies to comply with the **Human Rights Act 1998**. We protect those most at risk of human rights abuses and monitor human rights, reporting our findings to the UK governments and the United Nations. Our 'A' status as a National Human Rights Institution is due for its periodic review in October 2022.

Our role as a regulator

During 2021–22 we reiterated our role as a regulator of equality and human rights and what that means with regards to the responsibilities and powers we have at our disposal.

Our role is to promote understanding and engagement with equality and human rights issues, to enforce the law, and to use our authority and influence to secure improvements in policy, practice and the law where necessary. This involves regulating employers and service providers across Britain, whether private sector, public sector, charities or government. While we actively participate in debates across equality and human rights issues, and seek to foster good relations with and between stakeholders, it is not our role to be an advocacy or campaigning organisation.

Regulation is about preventing and challenging unlawful acts and enabling sectors and organisations to understand and meet their legal duties.

As a regulator, we use the whole range of our powers and statutory functions, including as a National Human Rights Institution, to improve equality and human rights and enforce the law.

Our regulatory model sets out our three-pronged approach:

1. Using **prevention** to inform policy-makers, employers and service providers to make decisions and policies that follow equality and human rights law, without us needing to take further action.
2. Using our **general powers** to encourage employers, public bodies and others to do the right thing without them being at risk of breaking the law.
3. Taking **remedial action** to enforce the law, taking offenders to court and publicising their offence as a deterrent to others.

Our independence as a regulator is enshrined in law and we pride ourselves on being impartial, authoritative and agile. We use our expertise to make decisions based on evidence, without fear or favour.

We adhere to the [Hampton Code of Practice for Regulators](#), which outlines five principles of good regulation: proportionality, accountability, consistency, transparency and targeting.

Further information on **our approach to regulation and our regulatory objectives** is on [our website](#)

Our strategic goals

Our strategic plan for 2019–22 set the following three strategic goals:

1. To ensure that people's life chances aren't held back by barriers in their way.
2. To make sure we have strong foundations on which to build a more equal and rights-respecting society.
3. To protect the rights of people in the most vulnerable situations.

Under these broad strategic goals, we focused our work on **six strategic aims**:



Core – strong equality and human rights laws protect people and data shows what is happening to people in practice.



Work – people in Britain have equal access to the labour market and are treated fairly at work.



Transport – public transport supports the economic and social inclusion of disabled people and older people.



Access to justice – people can access redress when they are wronged and have a fair trial in the criminal justice system.



Education – the education system promotes good relations with others and respect for equality and human rights.



Institutions – rules and practice governing entry into, exit from and treatment in institutions respect equality and human rights standards.

Making progress on all fronts

It is our job to consider equality and human rights for everyone, and it is our aim always to be alert to opportunities to make progress on equality and human rights across all nine protected characteristics in the **Equality Act 2010**. This can mean working to achieve balance where rights overlap. It also means that in some years, we make more progress for some protected characteristics than for others.

In performing our role, we work with employers, governments, regulators, charities and a wide range of other organisations to promote understanding of equality and human rights and compliance with the law. We support them to improve their practice too.

Some of our work is prominent and attracts public, political or media attention. Other work is lower profile, as we monitor progress of employers' activities and influence policy and decision-making in the private and public sectors.



Performance report

This performance report summarises what we achieved over the past year and the context in which we operated in England, Scotland and Wales. It also highlights our work and achievements as an international human rights body.

2021–22 was the final year of our 2019–22 strategic plan. Our **business plan for 2021–22** set out what we wanted to achieve.

We worked across Britain to promote equality of opportunity and protect human rights. We used the range of our powers in combination, including enforcement functions and wider statutory duties, adapting our work to devolved settings to address specific challenges.

Throughout the year, we reiterated our role as the impartial, independent regulator of equality and human rights in Britain. Regulation is about preventing and challenging unlawful acts and helping sectors and organisations to understand and meet their legal duties. Good regulation ensures compliance with the law and creates stability and predictability. It promotes confidence that rights are protected, that laws are enforced, and that action will be taken when laws are broken. It can highlight examples of good practice too.

The context for the year

The context for our work in 2021–22, as for every other organisation, was the challenge of delivering our business plan during the second year of the COVID-19 pandemic. The

continuing restrictions on people's freedoms in England, Scotland and Wales, affected how we engaged with stakeholders and how we carried out enforcement action. The emergence of the Omicron variant, with new restrictions in the winter of 2021, set back our plans to work with stakeholders by several months.

New work also emerged as it became clear that the effects of the pandemic were different and more severe for some groups than others, especially young and older people, disabled people, and lower-paid workers from ethnic minorities working on the frontline of the pandemic response.

Like many organisations, we faced an increased staff turnover. We also began looking for people with new skills and knowledge to make sure that we have the workforce we need to deliver our role as a regulator in the post-pandemic era. We successfully scaled up recruitment and made appropriate use of short-term, interim resource. We also invested in developing the skills of our existing staff. As a result, we maintained workforce capacity at 90% overall, increased our capability and improved the diversity of our workforce.

Our delivery and impact

The following sections highlight the impact of our activities in 2021–22. We describe the work according to which regulatory approach we adopted: did we seek to **evidence the issues, influence standard setting, ensure compliance with standards, or enforce the law?** We also highlight where work relates specifically to Scotland or Wales.

Our work on equality and human rights

The COVID-19 pandemic had significant implications for equality and human rights. We continued to work to understand and reduce the negative impact of the pandemic on groups and individuals with protected characteristics and ensure that equality and human rights are central to Britain's post-pandemic response and recovery.

Evidencing the issues

As COVID-19 put the social care system under great pressure, we launched an **inquiry into adult social care in England and Wales**. Following reports of reduced care packages and people's needs not being met, we wanted to understand the experiences of older adults, disabled adults and unpaid carers when challenging, or trying to challenge, local council decisions about adult social care or support. We will report our findings in 2022–23.

Our expert advice submitted to the **Independent Human Rights Act Review** was quoted throughout the review's report (published in December 2021) and praised at a roundtable of human rights organisations.

We released Phase 2 of our **human rights tracker**, which contains all of the most recent recommendations made to the UK by the UN treaty bodies and the Universal Periodic Review (UPR) and monitors and reports on how well the UK and Welsh governments are taking action to implement these. We have since trained over 115 people from different organisations on the tracker, including staff from the UK Parliament's Joint Committee on Human Rights.

In June 2021, we published the **findings of our restraint inquiry**. Our report made recommendations to the UK and Welsh governments, schools in England and Wales, and the inspectorates Ofsted and Estyn. Following the publication of our report into the use of restraint, the Welsh Government consulted on and updated its **Reducing Restrictive Practices Framework**, aligning it with our recommendations.

Following our consultation response of August 2021, **new statutory guidance on Seniors Law** includes an explicit focus on reducing use of force and addressing disproportionality for protected characteristic groups, and clearer information about requirements to make reasonable adjustments for disabled patients.

We **worked with medical bodies** including the British Medical Association and the Care Quality Commission on the continuing equality considerations of their work during the pandemic.

Following our research into **the use of sexual history and character evidence in rape and sexual assault trials**, HM Inspectorate of Prosecution in Scotland published Terms of Reference for a thematic review of the issue, citing our research and its recommendations.

Influencing standard setting

We advised the **Covid Recovery Commission** (CRC), highlighting the need to support specific groups including: young people, ethnic minority groups and disabled people. Drawing on our advice, in April 2021, the CRC's report, *Ambition 2030: A Partnership for Growth*, committed to embed equality and human rights into its investment, decision-making and progress measurements.

The Centre for Data Ethics and Innovation (CDEI) incorporated our advice on the equality and human rights implications of its new sector-specific **guidance on data tools in recruitment**, published in December 2021, which it co-produced with the Recruitment and Employment Confederation.

In September 2021, we joined the **Scottish Government's Human Rights Bill** Advisory Board to advise on how equality issues should be taken into account when drafting the Bill and an equality clause is now being considered for inclusion.

We made the case for the **COVID-19 public inquiry in Scotland** to consider equality issues. When a COVID-19 status certification scheme was introduced in autumn 2021, we sought to make sure that it did not have a disproportionate effect on particular groups.

The new **Wales Programme for Government** (published in December 2021) made a number of commitments that reflect our advice and policy positions, including:

- a commitment to implement the **Anti-racist Wales Action Plan**
- incorporating **UN human rights treaties** into Welsh law
- **improving evidence and data** by establishing Equalities Data and Race Disparities Units
- concerted **action to address pay gaps**, and
- tackling inaccessible **public transport for older and disabled people**.

We advised the Welsh Government that the **Curriculum and Assessment (Wales) Bill** needed to be underpinned by a human rights-based framework. The Bill was agreed by the Senedd with our amendment, which places a duty on teaching and learning providers for maintained schools and nursery schools to promote knowledge and understanding of the UN conventions on the Rights of the Child and the Rights of Persons with Disabilities. The Bill became law in April 2021.

Ensuring compliance with standards

In April 2021, we reviewed the publication of equality outcomes by all listed public bodies in Scotland, assuring **compliance with the Public Sector Equality Duty in Scotland**.

We influenced the Scottish Government to make sure the new public operator of the **ScotRail franchise was subject to the Public Sector Equality Duty** when it launched in April 2022.

As a result of our engagement, Scotland's Ethical Standards Commissioner strengthened and improved how the **new Code of Practice for Ministerial Appointments to Public Bodies** in Scotland understands and promotes equality.

Working with the **Scottish Funding Council** (SFC), we provided equality and Public Sector Equality Duty development sessions for SFC staff and helped it to identify the significant inequalities experienced by staff and students in Scotland's universities and colleges.

Working with the Scottish Human Rights Commission, we provided advice on how the Scottish Government's **National Care Service proposals** affect equality and human rights. We set out our expectation that the Scottish Government and other public bodies must use the equality and human rights legal framework to achieve a social care system that recognises everyone's right to participate fully in society.

Working with NHS National Education Scotland, we **embedded equality in all aspects of governance training** for NHS Scotland Board members and delivered pilot equality and Public Sector Equality Duty development sessions with Integrated Joint Boards. We commissioned research to improve understanding of different experiences of self-directed support, understand the handling of social care support complaints, and understand the effectiveness of social covenants and charters.

Our work advising the Welsh Government on **embedding equality and human rights in education** led to several commitments, including developing case studies for schools on human rights education.

Enforcing the law

Following our legal intervention, the UK Government implemented the provision of both **shielding and vaccination COVID-19 information** in accessible formats, in line with our advice.

In April 2021, we signed a **legal agreement with the Home Office** setting out the actions it will take to **address its failure to comply with equality law** when implementing 'hostile environment' measures. This agreement is a result of our November 2020 assessment and commits the Home Office to a two-year action plan of improvements. We have continued to work with the Home Office to monitor and assure progress against this plan.

Following our legal and policy interventions on the use of PAVA spray (an incapacitant similar to pepper spray), the Ministry of Justice implemented **guidance on the use of force across the adult prison estate**.

In July 2021, we signed a **legal agreement with the Scottish Legal Aid Board**, committing it to improving its **equality impact assessments** and reviewing how its policies affect people with **protected characteristics**. We consulted with advice organisations and identified actions we will take to support and strengthen advice provision on equality and discrimination issues in Scotland.

"We recognise that there is more we need to do to fully comply with our duties and so we will be taking this opportunity to work with the Commission to further embed equality into our policies and processes across the organisation. Over the next two years we will be following our agreed action plan across a range of work streams to ensure equality is at the heart of our work."

Scottish Legal Aid Board

Our work on age discrimination

Influencing standard setting

Our joint work with the Older People's Commissioner for Wales on **the rights of older people** was reflected by the Welsh Government in its Social Care Recovery Framework (July 2021) and new Age Friendly Wales Strategy (October 2021). The Senedd's Health and Social Care Committee raised the concerns we highlighted about how the **rights of care home residents** were affected during the COVID-19 pandemic and recommended that the Welsh Government work with us to uphold older people's rights.

Our work on disability discrimination

Evidencing the issues

In the previous year, we published findings from our inquiry into the **treatment of disabled people in the criminal justice systems** in England, Wales and Scotland. This informed the Ministry of Justice's review to identify the scope and effectiveness of tools used to screen individuals for a broad range of health conditions. This review goes a significant way to addressing the concerns raised by our inquiry.

"We are dealing with people with mental health conditions and disabilities all the time – day in, day out – and if we don't properly understand those conditions, we can't properly deal with our clients or with the people who are appearing before us. The findings and recommendations of the EHRC must be used to try and make the system fair for everybody, irrespective of disability."

Alex Preston, a defence solicitor who gave evidence to the inquiry

Influencing standard setting

In March 2021, we published resources for Special Educational Needs and Disabilities Information Advice and Support Services advisers to **challenge discriminatory exclusions**, in partnership with the England Information, Advice and Support Services Network. Over the last year almost half the advisers in England went on to download our guidance and there were four successful challenges using the skills gained following our training.

As a result of our advice and engagement, the **Office for Rail and Road aligned its language with the Equality Act**, collected better equality data on transport users, and required train operating companies to identify and meet the needs of disabled people during unplanned disruption. It also agreed to sign a Memorandum of Understanding with the Driver and Vehicle Standards Agency to strengthen their own monitoring and compliance with the Equality Act.

In December 2021, our advice was reflected in the **Mental Welfare Commission for Scotland's** consultation on investigating deaths during **compulsory care and treatment under mental health laws**.

Following our consultation response to its National Transport Strategy, **Transport Scotland integrated the Public Sector Equality Duty and human rights in their delivery plan and Regional Transport Partnerships**, with a set of national and regional equality outcomes that focus on reducing the biggest inequalities. They also developed a monitoring framework to track progress on achieving outcomes and wrote to all organisations receiving funding to encourage compliance with the Public Sector Equality Duty.

As a result of our engagement, the **Welsh National Transport Strategy 2021** has a strong emphasis on meeting legal equality and accessibility obligations, with **equality integrated into transport planning** at the highest level, and commitments to using inclusive design principles in investment decisions so that services and infrastructure are accessible.

Enforcing the law

In January 2021, **Network Rail's North West route signed a legally binding agreement with us after it failed to complete a Disability Impact Assessment** and make reasonable adjustments for disabled users during a refurbishment project in one of its stations. Accessibility improvements are now being made in stations undergoing refurbishment work.

In May 2021, our **investigation into Elite Careplus Limited** found that it used **unlawful pre-employment health questions on its job application form**. We took enforcement action after receiving evidence from the National AIDS Trust that the care agency was asking questions about applicants' health during recruitment. Elite Careplus Limited has now removed the questions and updated its recruitment process.

Following legal action with the Mental Welfare Commission against two care homes in Glasgow, **patients being held without consent or lawful authority have all now been discharged**.

Our advice led to **action to support special educational needs and disabled pupils** during the COVID-19 pandemic. Equal, the Scottish Qualifications Authority and Qualifications Wales addressed our advice by improving their compliance with the Public Sector Equality Duty. In September 2021, **the Scottish Qualifications Authority entered into an agreement with us to improve its equality practices**.

Our work on race discrimination

Evidencing the issues

During 2021 we carried out an **inquiry into the employment experiences and treatment of lower-paid ethnic minority health and social care workers** across England, Scotland and Wales. We launched the inquiry following evidence that frontline ethnic minority workers in health and social care had suffered disproportionate health risks and impacts from the COVID-19 pandemic. The full report was published in June 2022 with a number of key recommendations.

Ensuring compliance with standards

In line with our advice, in October 2021, the Department for Education confirmed plans to develop a 'model history curriculum' to equip teachers to teach about **'migration, cultural change and the contributions made by different communities'**.

Enforcing the law

In response to our investigation into antisemitism in the previous year, the Labour Party produced an **action plan** which we have continued to monitor to make sure our recommendations are implemented.

In December 2021, we opened a **fund to tackle racial discrimination and help victims seek justice**. Open for a minimum of two years, our race legal support fund allows legal practitioners to apply for funding to resolve complaints of racial discrimination, harassment and victimisation. By the end of the year, we had funded six cases, including a **footballer's race discrimination claim** against his former club and club director, and are considering many more.

"Thank you, so much, for all of your support throughout this potential challenge – both from a funding and legal perspective! We were enormously grateful that we were able to properly investigate the merits of the case and therefore identify that the challenge did indeed have prospects."

Lucy Cadd, solicitor at Leigh Day

We continued to monitor Pontins through a legally binding agreement signed in March 2021 to prevent racial discrimination, after we became aware of an 'undesirable guest list' being used by the organisation to exclude Gypsies and Travellers. After monitoring Pontins' compliance with the legal agreement, we decided to end it on 18 February 2022, as we were not satisfied that the company was taking the required steps to prevent unlawful race discrimination or meet its commitments under the agreement. We have since **launched a formal investigation that will consider whether Pontins has committed unlawful acts** under the Equality Act 2010.

Our work on religion or belief discrimination

Using our intervention power

We intervened in an appeal against an Employment Tribunal decision relating to the question whether a belief that sex is biological and immutable is a **philosophical belief protected under the Equality Act 2010 religion or belief protections**. Ms Forstater alleged that she was discriminated against when her contract was not renewed because of her 'gender critical' belief. The Employment Tribunal had decided that her belief was not protected.

We presented our arguments at the Employment Appeal Tribunal hearing on 27 and 28 April 2021, stating that the Employment Tribunal in Ms Forstater's case failed to consider the distinction between whether Ms Forstater held a belief that is protected, despite others finding it offensive, and the way in which Ms Forstater acted on that belief.

The Employment Appeal Tribunal agreed that Ms Forstater’s belief is a protected belief under **section 10 of the Equality Act 2010**. In doing so it provided important wider clarification that only the most extreme beliefs (such as Nazism or totalitarianism) will not be considered worthy of respect in a democratic society.

Our work on sex discrimination

Evidencing the issues

Our paper on **preventing sexual harassment in schools**, which sets out how a rights-based approach can support teaching, was used by the Department for Education in its guidance on sexual harassment in schools, published in September 2021. The new guidance includes consideration of pupils participating in the development of the curriculum as well as emphasising the importance of teaching about human rights in relation to boundaries and consent.

Influencing standard setting

We influenced **UK Government proposals on sexual harassment**. In July 2021, it committed to several actions reflecting our recommendations, including:

- a new proactive duty on employers to take all reasonable steps to prevent their employees from experiencing sexual harassment
- introducing explicit protections for employees from harassment by third parties
- commissioning us to produce a statutory Code of Practice, and
- looking at extending time limits for bringing Equality Act based cases to employment tribunals.

Our technical **guidance on preventing and responding to workplace harassment** was referenced as an example of good practice at the 2022 international conference on sexual harassment law, hosted by the Hong Kong Human Rights Association, which was attended by a number of other international human rights bodies.

Ensuring compliance with standards

During 2021 we worked with bodies representing service providers to develop **practical new guidance for providers of single-sex services**, to help them to comply lawfully with the permitted sex and gender reassignment exceptions in the Equality Act. This guidance, which was published on 4 April 2022, advises organisations such as hospitals, retailers, hospitality and sports clubs to put in place policies that are legal and balance the needs of different groups.

Enforcing the law

In April 2021, the East of England Ambulance Service Trust agreed a legally binding action plan with us after it failed to take necessary **steps to protect staff from sexual harassment**. The plan includes conducting staff surveys, delivering training, carrying out a risk assessment and putting mitigating actions in place. We have continued to monitor progress against the binding plan to ensure agreed actions are implemented.

Our work on sexual orientation discrimination

Enforcing the law

In October 2021, Jaguar Land Rover signed a legal agreement with us to improve its equality and diversity policies and practices after a gender reassignment case brought against it that raised concerns about its existing policies.

"We are committed to continuing to work with our leaders, employees and employee-led diversity networks to foster an inclusive and gender-balanced culture that is representative of the society in which we live."

Jaguar Land Rover

Our role as an international human rights body

As Chair of the Commonwealth Forum of National Human Rights Institutions (CFNHRI) since 2018 we had planned to hand over the Chair to the Rwanda National Commission for Human Rights (RNCHR) in 2020. However, this was postponed because of the COVID-19 pandemic and we continued as Chair throughout the year. During this time, we promoted the actions that

organisations can take to uphold disabled people's rights and ran a 'Connect across the Commonwealth' networking scheme, in which 90 representatives from 17 member organisations took part. We also worked on plans to hand over the Chair of CFNHRI to RNCHR in June 2022.

We have also been honoured to represent the European Network of National Human Rights Institutions on the GANHRI Sub Committee of Accreditation since July 2021, and to play a full part in the October 2021 and March 2022 sessions which determined the accreditation status of more than 40 National Human Rights Institutions across the world.

Building our Commission

Against the backdrop of the pandemic and recovery, we launched a programme of internal improvement and changed our executive leadership.

Mid-way through the year, a new Chief Executive joined the EHRC, with a mandate from the Board to focus the organisation on our core role as an effective regulator of equality and human rights. In the autumn, we embarked on a programme of organisational improvement, called 'Building our Commission'.

This programme will allow us to identify improvements to structures and processes, and fulfil our duty to taxpayers to make the best use of our resources to deliver our strategic aims to have a positive impact on equality and human rights across Britain.

Our business model

We work from four locations: our head office is in Manchester and we have offices in London, Cardiff and Glasgow. Our workforce is organised into three main functional areas, led respectively by our Senior Policy and Strategy Officer, our Director of Regulation, and our Chief Operating Officer.

Financial performance

Our 2021–22 resource budget (excluding depreciation) was £17.1 million and was allocated as £12.0 million administration and £5.1 million programme funding. We also received £0.5 million funding for capital projects.

Our net operational resource expenditure (excluding capital and depreciation) was £16.6 million and our capital investment was £0.49 million.

Further information is provided in the statement of accounts and notes to the accounts for the year ended 31 March 2022 which are set out from page 95 onwards.

The table below summarises total expenditure against budget (excluding capital and depreciation)

Year ended	Total budget £000	Total spend £000	Variance (underspend) £000	% Variance (underspend)
31 March 2022	17,100	16,562	(538)	(3.1)

We used our budget allocation to achieve our business plan objectives. Further details are in the 'Performance report' section.

The continuing impact of the COVID-19 pandemic reduced in-year expenditure on travel and subsistence as well as leading to court delays which reduced our expenditure on litigation. The delay in receiving our budget delegation from the Cabinet Office also inhibited some initial expenditure. We re-allocated corporate budgets and offset any short-term underspend by investing resource in staff wellbeing and training and development.

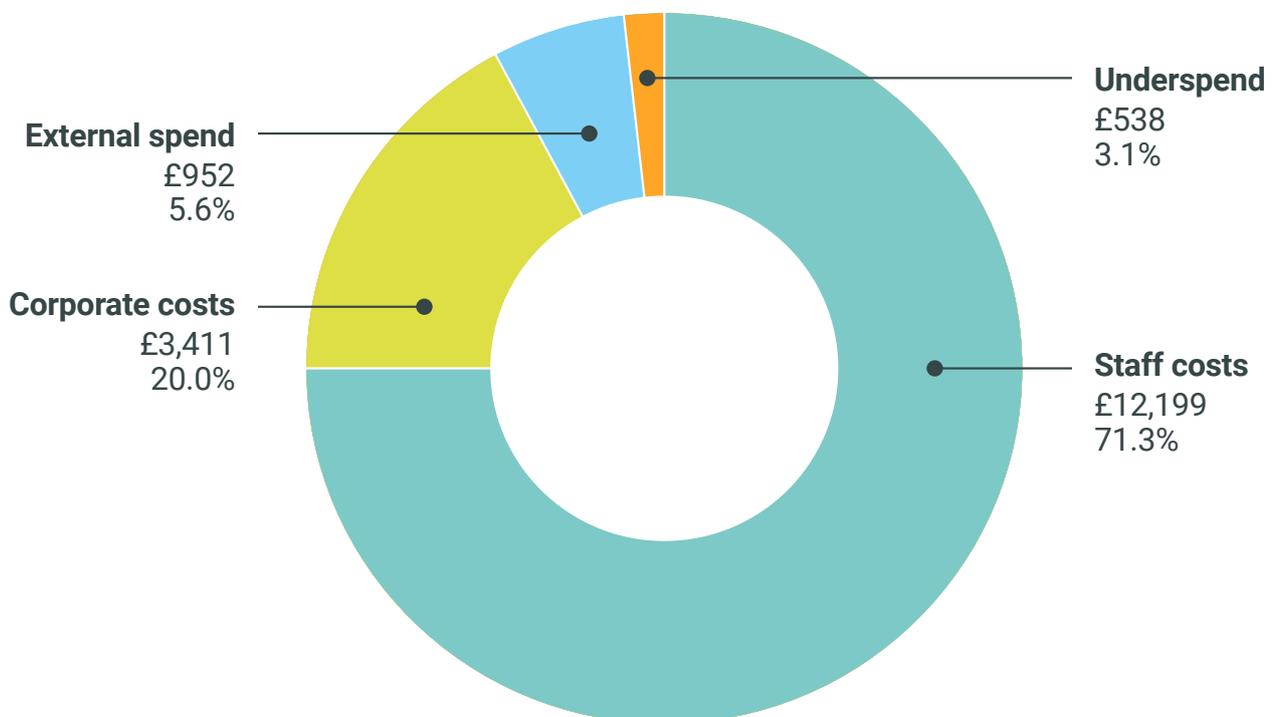
We continued to adopt an agile approach to business planning by holding regular review meetings during the year. This enabled us to reprioritise and reallocate budget to areas with greater impact.

Continuing periods of lockdown had a negative impact on the progress of work in Scotland and Wales and in specific areas of delivery, particularly legal casework and our legal support programmes where uptake and expenditure in the last quarter of the year was lower than anticipated resulting in an underspend in this area of work.

The chart below provides an analysis of key expenditure headings.

Expenditure (budget utilisation)

2021–22 (£000)



Along with other organisations, the EHRC has experienced higher than anticipated staff turnover. While we have compensated with very active recruitment throughout the year, some posts were vacant for longer than forecast and staff costs decreased during 2021–22 compared to the previous year.

Corporate costs include costs associated with IT systems, premises, recruitment, learning and development and financial services. We invested in our infrastructure and staff support programmes to facilitate remote and hybrid working. We re-opened all our offices and ensured that they provided a safe working environment. We invested in systems to deliver our business plan and provide staff with the tools they needed, including the first stage of the migration to a cloud-based platform and better business support systems.

In 2021–22, we spent £0.49 million of our total capital budget of £0.5 million. The expenditure related to the fit-out of our new London office, ensuring that it provides a flexible and safe working environment for our staff; planned investment in our IT infrastructure and end-user devices enabling enhanced remote working.

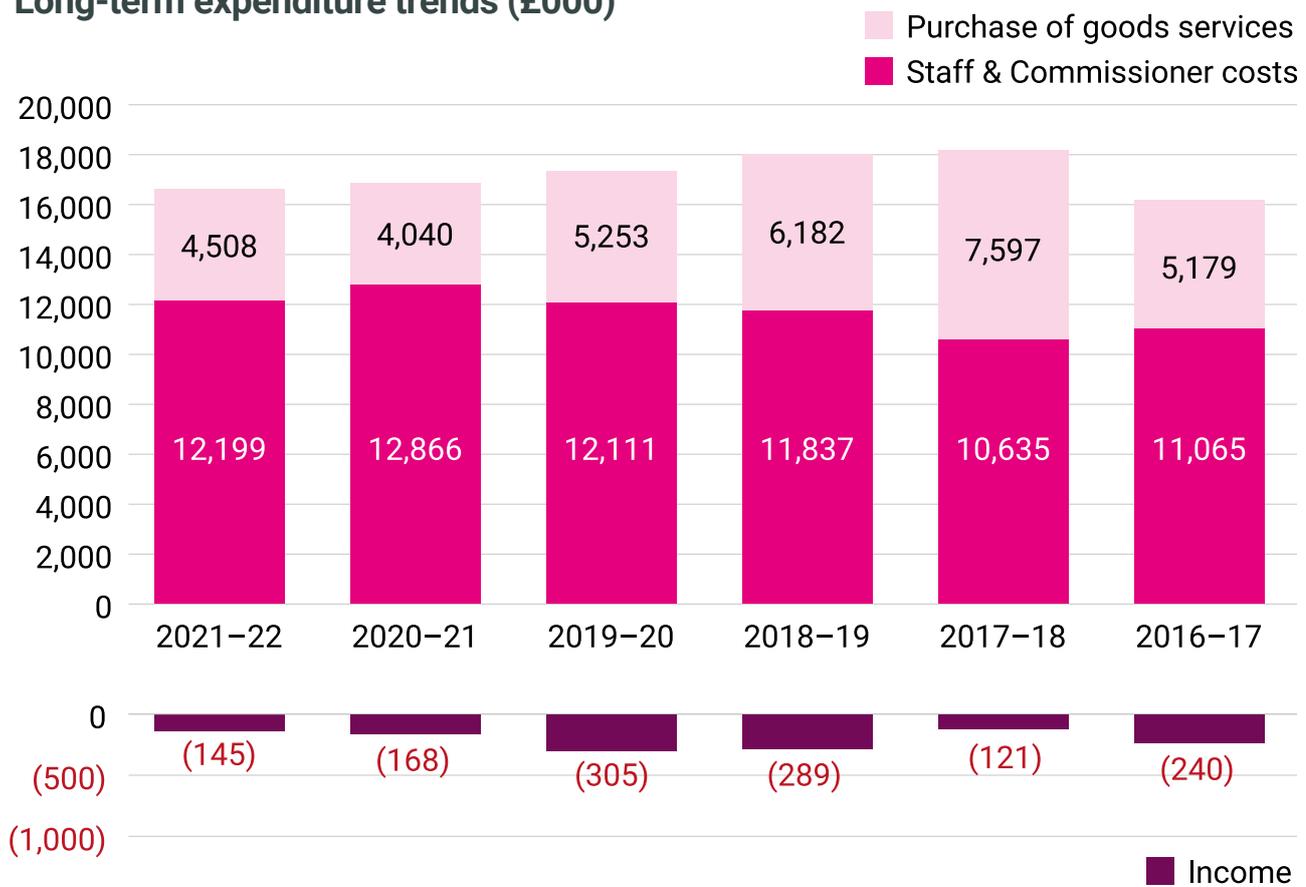
Capital structure

Our capital structure is shown as taxpayers' equity in our financial statements. In-year expenditure is funded by grant-in-aid received from our sponsoring department. We monitor our cash flow and our financial forecast to ensure we have sufficient cash to meet our net liabilities and to pay our creditors promptly. We ended the year with a cash balance of £375,000 (2020–21: £85,000). The increase is due to the expectation of receiving an invoice for capital works that did not arrive before 31 March 2022. The statements of financial position and changes in taxpayers' equity in the statement of account provide more information.

Long-term expenditure trends and value for money

Resource funding for 2021–22 of £17.1 million was utilised to fund staffing costs, overheads and to fund our programme of work. The EHRC experienced a real-terms reduction in funding year-on-year, **with funding reducing in real terms by 24.3%** from £20.4 million in 2016–17 (using the Bank of England inflation calculator).

Long-term expenditure trends (£000)



Payment of suppliers

We follow the Government’s prompt payment guidance to ensure that suppliers are paid as quickly as possible, especially when many businesses have been negatively affected by the COVID-19 pandemic. We settled all undisputed invoices¹ as soon as possible, with 94% of all invoices received settled within five working days. We paid 100% of undisputed invoices within the target range of 30 days.

¹ We define ‘undisputed invoices’ as those that quote a valid purchase order number and where we are content with the goods or service provided.

Our people

During the second year of the pandemic, we prioritised supporting the physical and mental wellbeing of our staff to enable them to do their jobs safely and well, whether working at home or from the office.

As most staff continued to work from home, we supplied them with the equipment and support they needed. We provided training and advice on working remotely and flexibly, with a wide range of initiatives to support mental health and wellbeing.

We opened all our buildings, in a COVID-secure way, to enable those who needed to work from an office to do so. Having consulted widely with staff, we introduced hybrid working arrangements when lockdown restrictions were eased. People returned initially for one day per week, building up to

at least 40% of their time by April 2022 to benefit from face-to-face working, increased innovation and engagement.

We have an extensive Inclusion Programme and we continued to make progress in the diversity and representation of our workforce this year, with increases in the percentage of disabled colleagues, those from ethnic minority backgrounds, and people identifying as lesbian, gay, bisexual or other.

Our gender pay gap figures show the difference in the median and mean rates of pay between men and women for base pay using 31 March 2021 data. The difference is expressed as a percentage of the hourly rate of pay for male and female employees. At 31 March 2021, we saw further reductions in all median pay gaps. Our headline data are below (at 31 March 2020 and 31 March 2021) and we published our full pay gap report on our website.

Pay gap	Median		Mean	
	31 March 2021	31 March 2020	31 March 2021	31 March 2020
Gender	-0.3%	-0.4%	1.0%	-1.3%
Ethnicity	0.6%	-0.9%	6.2%	6.3%
Disability	0.3%	-0.4%	11.6%	8.6%

We saw positive changes in our workforce diversity, as in the table below. We attracted successful applications from groups of people who are often under-represented in the workforce, with increased numbers of ethnic minority, disabled, lesbian, gay, bisexual and transgender colleagues.

Characteristic	31 March 2022	31 March 2021	Difference ²
Ethnicity			
Ethnic minority	24%	14%	+10%
White	71%	83%	-12%
Prefer not to say / not declared	5%	3%	+2%
Sex			
Female	61%	60%	+1%
Male	39%	40%	-1%
Marital status			
Married or in a civil partnership	42%	41%	+1%
Not married or in a civil partnership	37%	33%	+4%
Prefer not to say / not declared	21%	26%	-5%
Religion or belief			
Religion or belief	30%	36%	-6%
No religion or belief	56%	54%	+2%
Prefer not to say / not declared	14%	10%	+4%
Disability			
Yes	20%	19%	+1%
No	70%	74%	-4%
Prefer not to say / not declared	10%	7%	+3%

² Changes in these tables have been rounded to the nearest percentage figure and increases and decreases will not necessarily add to zero. In small organisations like ours, minor workforce changes can have a disproportionate effect on statistics.

Characteristic	31 March 2022	31 March 2021	Difference ²
Sexual orientation			
Lesbian, gay, bisexual, other	13%	12%	+1%
Heterosexual / straight	77%	80%	-3%
Prefer not to say / not declared	10%	8%	+2%
Caring responsibilities			
No	47%	54%	-7%
Yes	43%	41%	+2%
Prefer not to say / not declared	10%	5%	+5%
Age			
16–24	4%	2%	+2%
25–34	28%	25%	+3%
35–44	29%	28%	+1%
45–54	21%	23%	-2%
55–64	18%	21%	-3%
65+	1%	2%	-1%
Transgender			
No	86%	93%	-7%
Yes	2%	1%	+1%
Prefer not to say / not declared	12%	6%	+6%

Equality objectives

Under the Equality Act 2010, all public bodies are subject to the Public Sector Equality Duty. As part of this duty, we are required to set equality objectives. We have prioritised three types of equality objectives. These relate to:

- delivering our mandate
- our people, and
- our intelligence gathering.

Equality and diversity are at our core, and our equality objectives underpin our employment practices and ways of working. They are designed to:

- ensure that business improvements and any organisational changes are implemented fairly
- foster an accessible and inclusive working environment for all our staff
- ensure that our services are accessible and users' experiences and outcomes are positive, and
- promote equality within our supply chain, supporting our suppliers to embed equality and diversity practices within their own organisations and those they work with.

We publish an annual summary of the employment monitoring data we have collated and considered in our equality and diversity workforce reports. Information about our equality objectives and our performance in promoting equality of opportunity for all our staff is available on our website.

Environmental, social and governance statement

We are committed to maintaining ethical and sustainable business practices, which take into account the social, economic and environmental impact of our work, consistent with our foundations of fairness, equality of opportunity, dignity and respect.

HM Treasury revised the sustainability reporting requirements in November 2021 and the de-minimis exemption threshold for reporting has been reduced to 50FTE and 500m² of floor space (this was previously 250 FTE and 1,000m²). We have taken steps to develop an environmental, social and governance (ESG) statement and are setting measurable targets in the following four areas:

1. Operations (estates, travel and service delivery)

We assess the environmental impacts of our operations and set objectives and targets for improvements. The Greening Government Commitment (GGC) for 2021–25 has been released and includes new reporting areas, and more ambitious targets to reduce greenhouse gas emissions, domestic flights, waste generated, paper consumption and water use.

We work with the Government Property Agency and landlords to reduce the environmental impact of our estate. Our premises are leased, and utilities and services are recharged to us based on the floor area of the building occupied in most cases, so reporting of metrics regarding these may not give an accurate reflection of our actual consumption. Our goal is to achieve ISO14001 certification for environmental management while we plan for the greater digitalisation of internal processes. We ensure that all staff are familiar with the environmental impacts and expectations for their work.

2. Procurement

We support procurement that is open and competitive. We evaluate bids from suppliers against published criteria. The social value components – social, economic and environmental benefits that will be delivered through the contract – are given a minimum weighting of 10%. We make public our preference to work with suppliers who minimise their environmental impacts wherever possible and who are willing to reduce the impacts of the goods and services procured from them. Where we use Crown Commercial Service frameworks to procure our common goods and services, these embed the use of the Government Buying Standards that include consideration of social and environmental impacts.

3. People (inclusion, health and wellbeing)

We focus on building and maintaining a diverse and inclusive workplace and culture, with a workforce that represents our society, and where all our people thrive at work, develop their careers and perform to the best of their abilities. We invest in the health and wellbeing of staff through a range of initiatives, including mental health first aid, financial wellbeing and access to occupational health and counselling services. We also provide support for staff to discuss their concerns about climate change through our wellbeing programmes.

4. Community (staff engagement and volunteering)

We recognise that many staff care about the environment and climate change. We support staff to influence positive change in our workplace. Our staff network of 'Green Champions' raises awareness and shares ideas about how staff can reduce personal environmental impacts, such as by encouraging use of the Cycle to Work scheme. We encourage staff to volunteer in their community and allow up to three days paid volunteering leave. We encourage experienced staff to mentor school and university students to help with their career choices.

As a result of greater home-working in 2021–22, we significantly reduced our environmental impact with reduced travel and printing. We put in place ethical procurement practices, ensuring compliance in our supply chain. We invested in our people by moving all learning and development online.

We saw an increase in volunteering activity. In 2021–22, 140 hours of volunteering or public and community leave were recorded, a 120% increase on the previous year where 64 hours were recorded.

Performance report

Going concern

Our financial statements have been prepared on a going-concern basis. This is based on our assessment that we will continue to receive funding and our operations will continue for the foreseeable future.

This assessment has also considered that, for non-trading public sector entities such as the EHRC, the government financial reporting manual (FReM) provides that 'the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents, is normally sufficient evidence of going concern'.

The Equality Act 2006 requires the Secretary of State to provide sufficient funding for us to carry out our statutory functions and we are financed through grant-in-aid from our sponsoring department, the Cabinet Office. Our budget and grant-in-aid funding is included in the Cabinet Office main estimates for 2022–23, which have been approved by Parliament.



Marcial Boo,
Chief Executive and Accounting Officer

11 July 2022



Corporate governance report

The corporate governance report explains how our governance and management structure supports the delivery of the annual business plan, how we measure progress against the strategic plan and provide assurance of the effectiveness of our internal controls.

The Board of Commissioners is our top decision-making body. The Board's responsibilities include setting the strategic direction, reviewing overall performance and delivery, and ensuring good governance.

It delegates management of operations to the Chief Executive and holds the Chief Executive and staff to account by monitoring performance against priorities and making sure that resources are used effectively and efficiently.

The UK Government's Minister for Women and Equalities appoints Commissioners. **Profiles of current Commissioners** are available on [our website](#) and details of terms of office are in the remuneration report on page 59.

On 31 March 2022, the Board comprised 11 non-executive Commissioners. The Chief Executive is a Commissioner ex officio.

The Board met eight times during 2021–22. Attendance at meetings is shown below. Board meetings cover all aspects of our work and emerging equality and human rights issues. The Board receives updates from its sub-committees to gain further assurance and maintain an overview of risk.

Board meetings attendance by Commissioner and the Chief Executive

Name	Attendance / eligibility
Baroness Kishwer Falkner (Chairwoman)	8/8
Caroline Waters (Deputy Chair)	8/8
Suzanne Baxter	8/8
Jessica Butcher	8/8
Pavita Cooper	6/8
David Goodhart	8/8
Alasdair Henderson	7/8
Helen Mahy	8/8
Mark McLane	6/8
Dr. Lesley Sawers (Scotland Commissioner)	8/8
Su-Mei Thompson	8/8
Akua Reindorf	4/4
Susan Johnson	5/5
Lord Bernard Ribeiro	5/5
Martyn Jones (representing the Wales Committee)	4/5
Alastair Pringle (Acting Chief Executive from 1 March to 31 July 2021)	2/2
Melanie Field and Cath Denholm (Joint Acting Chief Executives from 1 August to 19 September 2021)	1/1
Marcial Boo (Chief Executive from 20 September 2021)	5/5

Board Committees

Scotland Committee

The Scotland Committee uses its powers, as set out in the Equality Act 2006, to advise the Board on the impact of our work in Scotland and gives advice to the Scottish Government about new laws or proposed changes to laws that affect only Scotland.

The Scotland Committee is chaired by the Scotland Commissioner, Dr. Lesley Sawers. It met six times during 2021–22. The Chair also convened one extraordinary meeting and one informal meeting.

In 2021–22, the Scotland Committee gave advice to the Board on matters including stakeholder engagement, the development of

the EHRC’s new strategic plan and business plan for 2022–23, preparation for the EHRC’s re-accreditation as a National Human Rights Institution, and the EHRC’s policy positions, including how they impact in Scotland.

The Scotland Committee was involved in developing the EHRC’s strategic plan for 2022–25. The Scotland Commissioner was a panel member at the consultation launch event and Scotland Committee members chaired stakeholder roundtable events on issues of relevance in Scotland. The Scotland Committee also held joint discussions with the Board and the Wales Committee. It was also represented on the Commissioner Working Group on Human Rights Monitoring that is overseeing our NHRI reaccreditation, and on the Disability Advisory Committee.

Scotland Committee meetings attendance

Name	Attendance / eligibility
Scotland Commissioner Dr. Lesley Sawers (Chair)	8/8
Committee members	
Mariam Ahmed	8/8
Phil Arnold	4/8
Marsali Craig	3/4
David Crichton	7/8
Charlie McMillan	7/8
Lindsey Millen	8/8
Bernadette Monaghan	4/8
Tatora Mukushi	5/8
Rami Okasha	6/8

More information about the Scotland Committee and its work is on [our website](#)

Wales Committee

The Wales Committee uses its powers, as set out in the Equality Act 2006, to advise the Board on the impact of our work in Wales and gives advice to the Senedd about new laws or proposed changes to the law that affect only Wales.

During the 2021–22 year and in the absence of a Wales Commissioner, the Wales Committee was chaired by Martyn Jones, a member of the Wales Committee. Eryl Besse was confirmed by the UK Government in March 2022 as the new Wales Commissioner from 1 April 2022.

The Wales Committee met five times during 2021–22. The Chair also convened one extraordinary meeting and one informal meeting.

In 2021–22, the Wales Committee gave advice to the Board on matters including the EHRC's new strategic plan, and inquiries into adult social care and into the experience of low-paid ethnic minority staff working in health and social care, as well as on the EHRC's re-accreditation as a National Human Rights Institution. The Wales Committee also held roundtable events to discuss artificial intelligence and equality issues, and on the implementation in Wales of the Socio-economic Duty under the Equality Act.

Wales Committee meetings attendance

Name	Attendance / eligibility
Martyn Jones (Interim Chair)	6/7
Rocio Cifuentes	5/7
Geraint Hopkins	4/7
Alison Parken	6/7
Grace Quantock	5/6
Mark Sykes	6/7
Beth Thomas	2/7
Faith Walker	3/7

More information about the Wales Committee and its work is on [our website](#)

Audit and Risk Assurance Committee

The Audit and Risk Assurance Committee (ARAC) supports the Board and the Chief Executive as Accounting Officer by providing independent advice and challenge to give assurance that governance arrangements and control frameworks are in place and operating effectively.

The ARAC was chaired by Susan Johnson, Commissioner, until January 2022 when Helen Mahy, Commissioner, assumed the role of Chair. The ARAC met five times during 2021–22.

In 2021–22, the ARAC considered a range of issues including financial performance, risk management, internal audit reports, including on cyber-security and business continuity, and the National Audit Office's annual audit opinion. The ARAC also reflected on its own performance. An effectiveness survey was conducted with all members and officers in October 2021 and an improvement plan agreed at a strategic session held in February 2022.

ARAC meetings attendance	
Name	Attendance / eligibility
Commissioners	
Susan Johnson	4/4
Suzanne Baxter	2/2
Helen Mahy	5/5
Su-Mei Thompson	1/1
Jessica Butcher	3/3
Independent Members	
Gill Eastwood	5/5
Charlotte Moar	5/5

Our auditors and internal audit representatives attended all meetings. The Government Equalities Office can attend meetings and did attend on five occasions.

More information about the ARAC is on [our website](#)

People and Workspace Committee

The People and Workspace Committee (P&WC) provides advice and assurance on matters affecting the employee lifecycle, including people, infrastructure and remuneration.

The P&WC was chaired by Caroline Waters, Deputy Chair, and met four times during 2021–22.

In 2021–22, the P&WC considered issues including actions taken during the COVID-19 pandemic, employee engagement, office spaces and refits, performance management, turnover, the EHRC’s ESG statement, and the EHRC’s improvement programme ‘Building our Commission’. The P&WC also provided oversight of strategic and operational people, infrastructure and information governance risks.

P&WC meetings attendance	
Name	Attendance / eligibility
Commissioners	
Caroline Waters	4/4
Pavita Cooper	2/4
Helen Mahy	4/4
Mark McLane	3/4
Su-Mei Thompson	3/4

More information about the P&WC is on [our website](#)

Disability Advisory Committee

The Disability Advisory Committee (DAC) was established in 2019, originally for one year, to provide advice on our work that supports disabled people. It was then agreed that it should run for the period of the strategic plan 2019–22. It therefore met for the last time in March 2022.

The DAC was chaired by Dr Rachel Perkins during 2021–22 and met four times during this period.

In 2021–22, the DAC considered issues including the UK Government’s National Disability Strategy, the EHRC’s report on the Convention on the Rights of Persons with Disabilities, and our inquiry into decision-making in adult social care.

Following the winding up of the DAC, we have made a commitment to engage with disabled people at an early stage in our planning process and will hold workshops in summer 2022 to seek expert views on how best to achieve this.

DAC meetings attendance	
Name	Attendance / eligibility
Rachel Perkins (Chair)	4/4
Sarah Coleman (Deputy Chair)	2/4
Simone Aspis	3/4
Marc Bush	3/4
Helen Chipchase	4/4
Miro Griffiths	3/4
Fazilet Hadi	4/4
Anna Lawson	2/4
Lord Colin Low	4/4
Liz Sayce	4/4
Michele Scattergood	3/4
Nicholas Watson	4/4
Colin Young	4/4

More information about the work of the DAC is on our website

Statement of Accounting Officer's responsibilities

Under the Equality Act 2006, the Secretary of State, with the consent of HM Treasury, has directed the EHRC to prepare for each financial year a statement of accounts in the form and on the basis set out in the Accounts Direction.

The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the EHRC and of its income and expenditure, Statement of Financial Position and cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual, and in particular to:

- observe the Accounts Direction issued by the Secretary of State, with the consent of HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis
- make judgements and estimates on a reasonable basis
- state whether applicable accounting standards as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the financial statements

- prepare the financial statements on a going-concern basis, and
- confirm that the Annual Report and Accounts is as a whole fair, balanced and understandable and take personal responsibility for the Annual Report and Accounts and the judgements required for determining that it is fair, balanced and understandable.

The Principal Accounting Officer of the Cabinet Office has appointed the Chief Executive as Accounting Officer of the EHRC. The responsibilities of the Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding the organisation's assets, are set out in 'Managing Public Money' published by HM Treasury.

As the Accounting Officer, I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that EHRC's auditors are aware of that information. As far as I am aware, there is no relevant audit information of which the auditors are unaware.

The EHRC is a statutory non-departmental public body established by the Equality Act 2006. It is Britain's national equality body under EU law and is recognised as an 'A' status National Human Rights Institution by the United Nations. We operate independently of Government and Parliament.

I was appointed as Chief Executive and Accounting Officer from 23 September 2021. Prior to my appointment, the role of Interim Accounting Officer was held by Alastair Pringle from 1 April 2021 to 31 July 2021 and by Cath Denholm from 1 August 2021 to 22 September 2021. Both Alastair Pringle and Cath Denholm issued formal letters of assurance at the end of their Accounting Officer tenures. Having attended Board and ARAC meetings and having sought and received assurance from my senior officers, I am content that there were no outstanding issues to note in the period before my appointment as Accounting Officer.

This Governance Statement, for which I as Accounting Officer take responsibility, is designed to give an understanding of our governance structure, internal controls and risk management processes and explains how assigned duties have been carried out during 2021–22.

Scope of responsibility

I have responsibility for maintaining a system of internal control that supports the delivery of our policies, aims and objectives while safeguarding the public funds and our assets. My role, supported by the Leadership Team and alongside the Board, includes ensuring that steps are taken to prevent and detect fraud, in accordance with the responsibilities assigned to me in 'Managing Public Money' and our framework document.

Corporate governance structures

Our corporate governance structures and information on how we are required to report to Parliament are set out in the Equality Act 2006.

Our relationship with our sponsor department, the Cabinet Office, is agreed through the Framework Document, which also contains details of my responsibilities as the Accounting Officer of the EHRC.

Our Annual Report and Accounts are laid before Parliament by the Cabinet Office and copies of the report are sent to the Scottish Parliament and to Senedd Cymru: Welsh Parliament.

More information about our corporate governance structures is on [our website](#)

Board of Commissioners

Details of the Commissioners who served as members of the Board during 2021–22 are on page 39.

Commissioners are independent and are required to disclose any matters that could potentially affect their judgement when participating in Board meetings and decisions. We maintain a register of Commissioners' interests and Commissioners are reminded on a regular basis to keep the register up to date.

The Commissioners' register of interests is on [our website](#)

The Board is responsible for setting overall direction, policy and plans. The specific role, responsibilities and functions of the Board and its Committees are set out in our Governance Manual, which is prepared in line with the Cabinet Office 'Code of Best Practice for Board Members of Public Bodies' and the UK Government's 'Corporate Governance in Central Government Departments: Code of good practice'. The Governance Manual, along with the Equality Act 2006 and our Framework Document (updated in November 2019), act as the Board's terms of reference.

The Governance Manual is on [our website](#)

The Board's composition departs from the Corporate Governance Code, which was written for government departments rather than public bodies, and advises having 'approximately equal numbers of ministers, senior civil servants, and non-executives'. Our Board contains no ministers and comprises non-executives (Commissioners) in accordance with the Equality Act 2006, which requires the Secretary of State to appoint a board of between 10 and 15 Commissioners. Members of the Board have a good balance of skills and experience to enable it to fulfil its responsibilities.

The Framework Document is on [our website](#)

The minutes of Board meetings are on [our website](#)

Board performance and effectiveness

During 2021–22, we built on the action plan agreed during the 2020–21 internal review of Board effectiveness which included work to:

- strengthen the processes for measuring and reporting on impact
- improve processes for capturing and taking action on lessons learnt to improve performance, impact and decision-making

- review stakeholder engagement and improve the potential of stakeholder relationships
- improve diversity across the organisation, particularly at senior levels, and
- support better mapping and use of the time and skills of Commissioners.

Work on the next Board effectiveness review began in January 2022 and is due to conclude in June 2022. This review is being facilitated by independent contractors and has a focus on:

- the balance of the Board's activities, to ensure that Commissioners' time, skills and experience have the greatest impact
- reviewing governance arrangements, including the framework of Board delegations, to ensure they facilitate effective decision-making
- the Board's relationships with its Committees and working groups, and
- the support provided to the Board by staff and engagement between the Board and staff.

The Board and its Committees receive management information, including reports on financial and operational performance and on people and workplace data. This is used to monitor performance and support decisions.

Executive leadership

The role of senior management is to help the Chief Executive to develop and implement strategy, provide leadership for staff, set work priorities, monitor performance and manage risk.

The Chief Executive is supported by decision-making groups that assist with the management of the organisation, its programmes, projects and regulatory activity. The groups and their remits were as follows.

The Leadership Team is chaired by the Chief Executive and meets on a weekly basis. It includes executive directors and directors and is responsible for:

- overseeing the day-to-day management of the organisation and delivery of our strategic and business plans
- developing our strategic approach, including how we work in England, Scotland and Wales
- our relationships with key stakeholders
- issues that have high reputational or operational risk, and
- leading the relationship with the Board and its committees.

The Strategy and Delivery Board (SDB) was co-chaired by the Director – Finance, Planning and Governance, and the Director – Strategy and Evidence. It consisted of Directors and Senior Principals. The SDB was responsible for decisions on interventions and strategies, monitoring delivery and impact and ensuring there was sufficient capacity to deliver within

proposed timescales and resource. The SDB was disestablished in October 2021 and its functions absorbed into the Leadership Team.

Internal audit

The annual internal audit plan provides independent assurance on our governance, risk management and internal controls. Audits are carried out in accordance with the guidance contained in the Public Sector Internal Audit Standards. The internal auditor reports on findings, provides comparators to similar organisations and makes recommendations to management, who develop and agree an action plan to address any weaknesses identified.

Mazars LLP acted as our internal auditor during 2021–22.

Areas reviewed and reported on as part of the 2021–22 plan included COVID-19 recovery, legal costs, cyber security, core financial controls, and business continuity.

The ARAC received reports from the internal auditor on each review and a progress report from management on actions to implement recommendations.

During 2021–22 and following an open tender exercise, we appointed TIAA Ltd as the new provider of internal audit service on the expiry of Mazars contract. An overlapping period was built into the contracts to enable a smooth transition as Mazars' completed their work plan for 2021–22 and TIAA assumed responsibility for internal audit from 2022–23.

Personal data incidents

Between 1 April 2021 and 31 March 2022, nine data breaches were reported. All incidents were fully investigated, and lessons learned. We voluntarily notified the Information Commissioner's Officer of two incidents that were below the threshold for reporting. The Information Commissioner's Office advised no further action was necessary.

Freedom of information requests

During 2021–22, we received 231 requests under the Freedom of Information Act 2000, a 16% increase on the previous year. Of those requests, 99% received a response within the statutory deadline. Sixteen requests were the subject of internal review. At year-end, 21 requests were in progress.

Internal whistleblowing

Our whistleblowing policy is available to all staff on our intranet and sets out the steps staff should take to raise their concerns about behaviours and practices at the EHRC. The policy is supported by detailed guidance

on the procedures to follow when raising these concerns. No issues were raised during 2021–22.

We carry out regular reviews of all our policies and have also drawn assurance from the ARAC's monitoring of our whistleblowing processes. We consider the policy and reporting arrangements to be effective.

External whistleblowing

As a Prescribed Whistleblowing Body,³ our mandate is to provide workers, who are concerned that their employer is breaching equality and human rights law, with a mechanism to make a disclosure to an independent body when they feel unable to disclose directly to their employer.

Every disclosure is recorded, and the information disclosed is assessed to help us decide whether to look more closely at an organisation's compliance with equality and human rights law and whether to take regulatory action.

Further information on whistleblowing and how we deal with concerns reported to us is on [our website](#)

³ Organisations and individuals that are listed in The Public Interest Disclosure (Prescribed Persons) Order 2014 are referred to as prescribed persons. Prescribed persons have a role in the whistleblowing process. This role is influenced by the statutory functions specific to each body.

Donations

We did not make any charitable or political donations in this year. A small amount of low-value peripheral equipment that could not be re-used was gifted to employees who left the organisation.

Complaints

All comments, feedback and suggestions about our work and performance are welcomed. During 2021–22, the procedures for dealing with complaints were revised and complaints are now classified as either informal (stage 1) or formal (stage 2).

In 2021–22, we handled 16 complaints (compared with 36 in 2020–21). The table below provides a summary of the outcome of these complaints.

Decision	Number of complaints
Referred to the Parliamentary and Health Service Ombudsman	1
Upheld	2
Partly Upheld	4
Not Upheld	10

Information about our complaints policy is on [our website](#)

Correspondence

Our correspondence function is an integral part of the public face of the EHRC. On a daily basis, we respond to emails, letters and phone calls from organisations, MPs, stakeholders and the general public requesting information, advice, legal support and action on a wide range of issues.

In 2021–22, we received 4,530 correspondence queries and responded to 4,227 (93%) within a target time of 20 working days.

Internal control

We have a comprehensive framework of procedures and controls which cover financial and non-financial processes. This framework is regularly reviewed to ensure that it complies with all current requirements and is tested as part of the internal audit work programme.

As the Accounting Officer, I have responsibility for our financial affairs, subject to limits delegated to me by the Principal Accounting Officer and outlined in the Framework Document. I delegate resource and capital budgets to directors based on the receipt of a business plan for their areas of responsibility.

We have a scheme of delegation that underpins the financial delegations contained in the Framework Document. Directors have authority to sub-delegate budget and the authority to make financial transactions to other budget holders. The scheme enables budget holders to make decisions and holds them accountable for the effective management of their delegated budget, the decisions they make and the delivery of their work plan against agreed milestones. Budget holders are required to report on their performance monthly up to the Leadership Team.

Performance information is subject to further periodic scrutiny and review by the Board and the ARAC. They are provided with information to enable them to function effectively. Strategic risks and issues considered by senior management are escalated to the Board, with agreed management action where appropriate.

Government functional standards

Her Majesty's Treasury (HMT) has introduced [functional standards](#) for central government departments and Arm's Length Bodies (ALB). As a body of the Cabinet Office, we have reviewed the fourteen relevant functional standards in line with HMT's requirements in [DAO 05/21](#). We have plans in place to meet all requirements that are applicable to our corporate needs and priorities in 2022–23.

Fraud

A counter-fraud policy is in operation which follows Government requirements. Staff are expected to act with integrity, and to safeguard the public resources for which they are responsible at all times.

There were no cases of fraud identified in 2021–22.

Conflicts of interest

The staff Code of Conduct requires staff to declare all interests, including paid and unpaid external roles which may (or may be perceived to) conflict with their role in the organisation. The Code explains the actions that staff need to take to excuse themselves from any activity where their interest may be perceived as influencing their judgement.

The Code also explains that it is the employee's responsibility to keep their information up to date and accurate. Declarations returned are recorded, reviewed and assessed.

We have reviewed the declarations received during 2021–22 and are satisfied that no employees of the organisation hold external roles that present a conflict of interest to the EHRC.

Auditing of accounts

The National Audit Office carries out our external audit on behalf of the Comptroller and Auditor General.

Risk management

The Board agrees the overall risk framework. Our approach to risk management is based on devolved accountability, with risks owned by those best placed to manage them.

We maintain strategic and operational risk registers which rate risks according to their likelihood and impact across all our functions. Risks are reviewed monthly by the Leadership Team to ensure effective mitigations are in place.

Detailed scrutiny of our risk management processes is undertaken by the ARAC on behalf of the Board. The ARAC receives regular risk management reports from the executive. Reports include a risk scoring, changes in risk scoring and mitigations in place or planned. The Board reviews the corporate risk register and risk appetite on at least an annual basis.

Our internal auditor regularly reviews and reports on risk management processes to provide assurance that these are operating effectively. Our internal auditors put forward recommendations during the year to improve the effectiveness of our risk management framework and these recommendations were accepted by the ARAC.

Between December 2021 and March 2022, the ARAC oversaw a review of our strategic risk register, reporting formats and overall risk framework. This was led by an independent risk expert and ensured closer alignment between corporate and strategic risk registers. In February 2022, the ARAC approved a revised risk register and reporting format. This revised register is now in use.

Strategic risk assessment

Our 2021–22 strategic risk register contained six principal risks reflecting the broad range of our agenda and issues we address, the complexity of the political and social context in which we operate and our need to be able to maximise our impact with limited. We have carried out a fundamental review of our risk register and processes for recognising risks and in February 2022 we approved a new strategic risk which became active from 1 April 2022.

This change in approach is reflected in the end of year risk ratings. Of the six principal risks identified at the start of 2021–22, five were rated amber at the end of the year. The remaining risk, related to the delay by the UK Government in confirming our budget allocation for 2022–23, was not resolved by the end of year and was rated red.

Key risk	Mitigating actions	End of year risk rating
That we do not address the most pressing and relevant human rights and equality issues in society.	Structured methods of selection, prioritisation and reprioritisation of our work through the year.	Amber
That our work does not have the impact we sought.	Focus on our approach to achieving impact, committing the right method and resource and choosing the right partnerships.	Amber
That we are unable to deliver on our strategic ambitions and diminish our future funding basis.	Strong case made for the 2021–22 and then 2022–25 Spending Reviews, including demonstrating effective use of our funding.	Red
That we do not have the skills, capability, systems and culture to deliver our strategic ambitions, keep pace with technology and new ways of working and respond to major new challenges such as cyber threats or climate change.	Design and implementation of a multi-year Change Programme aligned with the 2022–25 strategic plan. Senior structure review to focus on our role as regulator. Investment in workplaces to encourage collaboration and introduce new technology; developed an ESG statement.	Amber
The EHRC's role and remit is further limited resulting in loss of impact, reputation and status.	Engagement with governments in Britain on major policy and reform agendas, making the case for the EHRC's role as the regulator of equality and human rights in Britain.	Amber
That our reputation and ability to have an impact in balancing rights and promoting cohesion in society is weakened.	Communications and policy activity to demonstrate and maintain our impartial and independent role with clarity and conviction.	Amber

Accounting Officer's assurance

As Accounting Officer, I have responsibility and accountability for the EHRC, its management, the efficient use of public funds and stewardship of its assets. I have responsibility for ensuring that the EHRC has systems of governance, risk management and internal control in place and I am responsible for reviewing the effectiveness of these systems.

The system of internal control reflects good practice. It identifies and manages risk, rather than eliminate all risk of failure. It provides reasonable but not absolute assurance of effectiveness, supporting the achievement of our aims and objectives, while safeguarding our funds and assets, in line with 'Managing Public Money'. These controls have been in place throughout 2021–22 and up to the date of approval of the Annual Report and Accounts, and accord with Treasury guidance.

My review of effectiveness is informed by assurance received from the previous Accounting Officers, Executive Directors and Directors (budget holders) throughout the year and from the work carried out by the ARAC. It is further supported by the assurance received from internal and external audit opinions.

Assurance provided by delegated budget holders

As part of the delegation process, budget holders are required to confirm that they understand the terms of the delegation, their limits of authority and that they are aware of current guidelines and controls.

At the end of the financial year, budget holders are required to complete an assurance statement that confirms that they have met all of their obligations or made me aware of any instances where controls have not been met in the following areas:

- management of financial resources
- managing staff performance
- risk identification and management, and
- audit arrangements.

Budget holders are also required to make me aware of any contingent liabilities or potential claims against the organisation that have not been disclosed elsewhere. I am assured that, on review of the returns received, that there is nothing of this nature that needs to be brought to the attention of the auditors.

Assurance provided by the ARAC

The ARAC provides independent oversight and constructive challenge to give assurance that our governance arrangements are appropriate and are operating effectively.

The Chair of the ARAC has provided the following statement:

"We have an effective Audit and Risk Assurance Committee. ARAC members possess a range of skills and experience and provide valuable insight and scrutiny. Throughout the year the ARAC worked with the EHRC's senior management to ensure that adequate controls were in place. In October 2021 we conducted an effectiveness review of the ARAC and agreed an action plan for improvement; this plan covers a range of areas including governance, training and administration and is due to be completed by October 2022.

The ARAC received regular reports from management on financial performance, risk and the EHRC's policies. We received strong assurance on the organisation's approach to information governance and received regular reports on anti-fraud and whistleblowing procedures, with no concerns arising. We maintained a strong focus on improving governance procedures, particularly risk management and assurance processes, and will continue to scrutinise and seek further assurance during 2022–23 that new frameworks put in place by management are effective.

The ARAC engaged with the EHRC's internal and external auditors throughout the year. We reviewed the internal audit plan and reports received and oversaw the procurement of a new internal audit provider. The ARAC Chair reported to the Board at each meeting and provided assurance on matters such as risk management, governance and internal control.

The ARAC is therefore of the opinion that control systems in place have performed adequately and there are no significant issues or weaknesses to be drawn to the attention of the Accounting Officer."

Assurance provided by the annual internal audit opinion

The internal auditors provide an annual assurance statement based on the findings of their work during the year. As Accounting Officer, I review these reports and the recommendations made and ensure that maintaining and improving effective governance remains a key priority for management and that any recommendations made by the internal auditors are acted upon.

Five audits were undertaken this year, one of which was advisory in nature and was not provided with a level of assurance.

Of the four audits provided with a level of assurance, three were rated as moderate and one rated as substantial.

A number of recommendations have been made based on the findings of the audit work, but no fundamental control weaknesses were identified. From the reports received, there were zero Priority 1⁴ (fundamental) recommendations, 18 Priority 2⁵ recommendations and 10 Priority 3⁶ recommendations. All recommendations have been reviewed by management and actions agreed. At the end of the financial year, there were 5 outstanding recommendations to be implemented.

This year, based on their audit work, the internal audit opinion on the framework of governance, risk management, and control within the EHRC was **Moderate**. The following summary statement was provided.

‘Certain weaknesses and exceptions were highlighted by our audit work, **none were considered fundamental** and no limited assurances have been provided during the period.

⁴ Priority 1 (Fundamental) Significant weakness in governance, risk management and control that if unresolved exposes the organisation to an unacceptable level of residual risk.

⁵ Priority 2 (Significant) recommendations represent significant control weaknesses which expose the organisation to a moderate degree of unnecessary risk.

⁶ Priority 3 (Housekeeping) recommendations show areas where we have highlighted opportunities to implement a good or better practice, to improve efficiency or further reduce exposure to risk.

Improvements are however, required to enhance the adequacy and effectiveness of the framework of governance, risk management and control. In particular, we draw attention to the need to continue to improve risk management and the relatively low implementation rate of internal audit recommendations.

These matters have been drawn to the attention of management, to whom we have made several recommendations. All of these have been, or are in the process of being addressed, as detailed in our individual reports.'

Accounting Officer's conclusion

I have considered the evidence provided during the production and review of the Annual Governance Statement and the independent advice and assurance provided by the ARAC. I am content that a good system of internal control which was robust and fit for purpose, including the maintenance of an appropriate structure for managing risk, was in place for the year ended 31 March 2022.

I conclude that we have satisfactory governance and risk management systems with effective plans to ensure continuous improvement.

I confirm that this Annual Report and Accounts is fair, balanced and understandable and I take responsibility as Accounting Officer for the judgements made to ensure that it is fair, balanced and understandable.



Marcial Boo,
Chief Executive and Accounting Officer

11 July 2022



Remuneration and staff report

This section provides details of the remuneration (including any non-cash remuneration) of Commissioners, independent members, the Chief Executive and Senior Directors. The content of the tables and fair-pay disclosures is subject to audit.

Remuneration and staff report

Remuneration of the Chair and other Board members

Commissioners are appointed by the UK Government's Secretary of State for Women and Equalities for a period of between two and five years and may be reappointed for one additional period.

The daily remuneration rate for the Chair, Deputy Chair and Commissioners is set by the Secretary of State. Board members are expected to work a number of days⁷ on EHRC business as prescribed in their letter of appointment. Any additional days for which fees are claimed must be approved by the Chair in advance. Fees are paid in 12 equal instalments across the year and appointments are not pensionable.

Commissioners attend formal and informal meetings of the Board, support specific programmes of work, represent the EHRC

at external events and attend training or developmental events as required. Commissioners and Committee members claim travel and subsistence expenses in accordance with the allowances set out in the Commissioners' fees and expenses guidelines and all claims are approved by the Corporate Governance team. HMRC guidelines class any travel to Board meetings as 'commuting', and any expenses claimed for these are subject to tax and National Insurance. The EHRC meets the resultant tax liability for these expenses.

⁷ The Chair is remunerated at a rate of £500 per day and is expected to work for up to 100 days per annum (total fees £50,000 per annum). The Deputy Chair is remunerated at a rate of £450 per day and is expected to work for up to 52 days per annum (total fees £23,400 per annum). Commissioners are remunerated at a rate of £400 per day and are expected to work for up to 25 days per annum (total fees £10,000 per annum). From 1 January 2022, the Secretary of State approved an additional 5 days allowance per annum for the Chairs of the Audit and Risk, Wales and Scotland Committees.

a) Chair and Commissioners' pay summary (the information in tables b, c and d is subject to audit)	2021-22 £000	2020-21 £000
Board members' fees (tables b, c and d)	184	157
Board members' employer's National Insurance contributions (NICs) (tables b, c and d)	10	9
Statutory and advisory committee members' fees (tables e, f and g)	98	94
Total	292	260

The above table is a summary of emoluments disbursed. Further detail is shown in the tables below.

b) Chair

Baroness Kishwer Falkner was appointed as Chairwoman effective from 1 December 2020 for a period of four years.

	2021-22 £	2020-21 £
Chair's fees	50,000	16,667 ⁸
Employer's NICs	5,679	1,896
Total for year (excluding expenses)	55,679	18,563
Expenses	155	-

David Isaac – Chair from 1 April 2020 – 9 August 2020

	2021-22 £	2020-21 £
Chair's fees	-	17,900 ⁸
Employer's NICs	-	1,965
Total	-	19,865
Expenses	-	-

⁸ Full year equivalent for David Isaac and Baroness Falkner is £50,000.

c) Deputy Chair

Caroline Waters served as Deputy Chair and was reappointed for a five-year term from 15 January 2018.

	2021-22 £	2020-21 £
Deputy Chair's fees	23,400	31,205 ⁹
Employer's NICs	2,009	3,094
Total	25,409	34,299
Expenses	216	-

d) Fees and expenses for each Commissioner

	Fees £		Expenses £	
	2021-22	2020-21	2021-22	2020-21
Suzanne Baxter Appointed 27 April 2018 for an initial four-year term	10,000	14,000 ¹⁰	609	-
Jessica Butcher Appointed 1 December 2020 for an initial four-year term	10,000	3,333 ¹¹	390	-
Pavita Cooper Appointed 27 April 2018 for an initial four-year term	10,000	10,000	-	-

⁹ 2020-21 fees include an additional allowance while acting as Chair during the period 8 August to 30 November 2020. For the purposes of the calculation, fees are annualised by dividing by 365 days; Caroline Waters received fees at the Deputy Chair's daily rate of £64.20 for 250 days (£16,050) and at the Interim Chair's rate of £131.79 for 115 days (£15,155).

¹⁰ Suzanne Baxter received additional fees of £4,000 for (10 days) work completed on an investigation during 2020-21.

¹¹ FYE (Full Year Equivalent) = £10,000.

d) Fees and expenses for each Commissioner (continued)

	Fees £		Expenses £	
	2021-22	2020-21	2021-22	2020-21
David Goodhart Appointed 1 December 2020 for an initial four-year term	10,000	3,333 ¹¹	384	-
Alasdair Henderson Appointed 27 April 2018 for an initial four-year term	12,400 ¹²	10,000	80	-
Susan Johnson Re-appointed 7 January 2019 for a three-year term	7,664 ¹¹	13,679 ¹³	396	151
Mark McLane Appointed 27 April 2018 for an initial four-year term – resigned 31 March 2022	10,000	10,000	-	-
Helen Mahy Appointed 27 April 2018 for an initial four-year term	10,500 ¹⁴	10,000	450	-
Lord Bernard Ribeiro Appointed 1 December 2020 for a one-year term	6,667 ¹¹	3,333 ¹¹	-	-
Dr. Lesley Sawers Reappointed 29 March 2021 for a four-year term	10,500 ¹⁴	10,000	832	72

¹² Paid one additional day per month from October 2021 as lead Commissioner for policy.

¹³ 2020-21 fees include an additional allowance while acting as Deputy Chair during the period 8 August to 30 November 2020. For the purposes of the calculation, fees are annualised by dividing by 365 days; Susan Johnson received fees at the Commissioner daily rate of £27.43 for 250 days (£6,858) and at the interim Deputy Chair's rate of £59.31 for 115 days (£6,821).

¹⁴ Paid five additional days' allowance (£2,000) per annum in respect of acting as sub-committee chair; £500 represents payment from January – March 2022.

d) Fees and expenses for each Commissioner (continued)

	Fees £		Expenses £	
	2021-22	2020-21	2021-22	2020-21
Su-Mei Thompson Appointed 1 December 2020 for an initial four-year term	10,000	3,333 ¹¹	403	-
Akua Reindorf Appointed 1 January 2022 for an initial four-year term	2,500 ¹¹	-	160	-
Sub-total	110,231	91,012	3,704	223
Employer's NICs paid on fees and expenses	2,201	2,479	-	-
Total	112,432	93,491	3,704	223

e) Fees and expenses for the Scotland and Wales Committees (summary)

Committee members are remunerated at a rate of £250 per day and are expected to work for 12 days per annum (total fees £3,000 per annum). Members are expected to attend Committee meetings, to meet with EHRC staff to support programmes or projects and to represent the EHRC at external events.

	Fees £		Expenses £	
	2021–22	2020–21	2021–22	2020–21
Scotland Committee	26,250	22,500	-	92

During 2021–22, the Scotland Committee consisted of eight members who were paid fees of £3,000 each for the whole reporting period. One member resigned on 31 December 2021 and received fees of £2,250 up to this date.

During 2020–21, the Scotland Committee consisted of five members who were paid fees of £3,000 each for the whole reporting period. In addition, two members' terms ended on 31 December 2020 and they received fees of £2,250 each for the period they were in post. Four new members were appointed on 1 January 2021 and they received fees of £750 each until the end of the reporting period.

	Fees £		Expenses £	
	2021–22	2020–21	2021–22	2020–21
Wales Committee	27,104	28,371	655	-

During 2021–22, the Wales Committee consisted of six members who were paid fees of £3,000 each for the whole reporting period.

One member resigned in March 2022 and received fees totalling £2,854 for the year. Martyn Jones received an extra allowance while acting as Chair of the Committee in the absence of a Wales Commissioner, receiving total fees of £6,250.

During 2020–21, the Wales Committee consisted of seven members who were paid fees of £3,000 each for the whole reporting period. Two additional members were appointed in July 2020 and received fees of £1,500 each.

Additionally, two members received additional allowances authorised by the Chair of the board for acting as the Chair of the Committee (as above) and for carrying out additional duties due to the absence of a Wales Commissioner respectively – these totalled £4,371.

Total (Scotland and Wales)	53,354	58,871	655	92
Employer's NICs paid on fees and expenses	-	161	-	-

f) Fees and expenses for Audit and Risk Assurance Committee independent members

	Fees £		Expenses £	
	2021-22	2020-21	2021-22	2020-21
Charlotte Moar Re-appointed 1 May 2021 for an additional two-year term	3,000	2,000	202	-
Gill Eastwood Re-appointed 1 May 2021 for an additional two-year term	3,000	2,000	168	-
Total	6,000	4,000	370	-
Employer's NIC	119	-	-	-

Independent members receive an allowance of £250 per day and are expected to work a minimum of eight days per year. Additional days (up to four per annum) are allowable and both the ARAC independent members claimed four additional days in 2021-22 for work relating to the appointment of the new CEO, changes in the Commissioners appointed as ARAC members and completion of the ARAC effectiveness review.

g) Fees and expenses for the Disability Advisory Committee

	Fees £		Expenses £	
	2021-22	2020-21	2021-22	2020-21
Disability Advisory Committee	39,000	39,393	-	-

During 2021-22, the DAC consisted of 13 members who were paid fees of £3,000 each for the whole reporting period.

During 2020-21, the DAC consisted of 14 members. One member resigned on 18 May 2020 and received fees of £393 for the period they were in post.

Staff pay and pension arrangements

Remuneration policy

The Equality Act 2006 details our authority to remunerate employees. We are responsible for the payment of any deductions from pay to the appropriate body and subject to HMT pay remit guidance when making any annual pay increases.

The reward package of senior managers (the Chief Executive and the Executive Directors) is reviewed by the People and Workspace Committee (P&WC) annually.

The following section of the report contains details of the remuneration and pension interests of the senior managers.

- All permanently employed Executive Directors have employment contracts with a three-month notice period; for the Chief Executive, a six-month notice period is required.
- There are no elements of the remuneration package that are not cash.

Salary and pension entitlements (this information is subject to audit)

The following tables provide details of the salary, pension entitlements and value of any taxable benefits in kind of our most senior officers for the period ended 31 March 2022.

Salary

Salary includes gross salary, performance pay or bonuses, overtime, reserved rights to London weighting or London allowances, recruitment and retention allowances and any other allowance to the extent that it is subject to UK taxation.

Non-consolidated award (bonus)

Bonuses paid are based on performance levels achieved against agreed objectives, these are assessed as part of the annual appraisal process. The bonuses paid in 2021–22 related to performance in 2020–21 and the comparative bonuses reported for 2020–21 related to performance in 2019–20.

Benefits in kind

The monetary value of benefits in kind covers any benefits provided and treated by HM Revenue and Customs as a taxable emolument. No benefits in kind were paid in 2021–22 (none in 2020–21).

Remuneration (salary, benefits in kind and pensions)

Single total figure of remuneration					
	Salary £000 (bands of £5,000)	Bonus £000 (bands of £5,000)	Benefits in kind £000 (rounded to nearest £100)	Notional pension benefits £000 ¹⁵ (to the nearest £1,000)	Total £000 (bands of £5,000)
Marcial Boo, Chief Executive¹⁶					
2021–22	70–75 FYE 120–125	-	-	26	95–100
2020–21	-	-	-	-	-
Melanie Field, Chief Strategy and Policy Officer					
2021–22	95–100	-	-	37	135–140
2020–21	95–100	0–5	-	50	145–150
Cath Denholm, Chief Operating Officer¹⁷					
2021–22	95–100	-	-	39	135–140
2020–21	80–85 FYE 95–100	-	-	31	110–115

¹⁵ The FReM requires the inclusion of a column for pension benefits and a 'Total' column. The value of pension benefits accrued during the year is calculated as (the real increase in pension multiplied by 20) plus (the real increase in any lump sum) less (the contributions made by the individual). The real increases exclude increases due to inflation or any increase or decreases due to a transfer of pension rights. The 'Total' column includes the value of the pension benefits. This figure is notional and does not represent remuneration received directly by individuals.

¹⁶ Marcial Boo was appointed as Chief Executive from 20 September 2021.

¹⁷ Cath Denholm was appointed as Executive Director (Chief Operating Officer) from 1 June 2020.

Single total figure of remuneration					
	Salary £000 (bands of £5,000)	Bonus £000 (bands of £5,000)	Benefits in kind £000 (rounded to nearest £100)	Notional pension benefits £000¹⁵ (to the nearest £1,000)	Total £000 (bands of £5,000)
Alastair Pringle, Acting Chief Executive¹⁸					
2021–22	40–45 FYE 120–125	-	-	35	75–80
2020–21	100–105 (95–100 to 11 Jan; 120–125 from 12 Jan)	0–5	-	45	150–155
Rebecca Hilsenrath, Chief Executive					
2021–22	95–100 ¹⁹ FYE 120–125	-	-	-	-
2020–21	95–100	0–5	-	39	135–140
Malcolm Cornberg, Interim Executive Director Corporate services					
2021–22	-	-	-	-	-
2020–21	25–30 ²⁰ FYE 160–165	-	-	-	25–30

¹⁸ Alastair Pringle was appointed as acting Chief Executive from January 2021 and received remuneration in line with the permanent Chief Executive from this date until he left the organisation in July 2021.

¹⁹ Rebecca Hilsenrath received a basic salary of £95,000–£100,000 (FYE £115,000–£120,000) while chief executive of the EHRC (April to December 2020), and resigned from the organisation on 31 March 2021.

²⁰ Malcolm Cornberg was appointed to the post of Interim Executive Director Corporate Services on 9 January 2020; this temporary appointment was not pensionable and does not include any bonus. The total annual remuneration has been calculated as being in the range £160,000–£165,000; the figure quoted in the table above represents payment made between 1 April and 5 June 2020.

Pay multiples (this information is subject to audit)

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid director in their organisation and the median remuneration of the organisation's workforce.

Total remuneration includes salary and allowances, non-consolidated performance-related pay and benefits in kind. It does not include severance payments, employer pension contributions or the cash equivalent transfer value (CETV) of pensions.

Full-time equivalent (FTE) is defined as actual hours worked as a proportion of a full working week (36 hours).

For the purposes of calculating the pay ratio, the EHRC has estimated the annual remuneration paid to interim staff, as this information is not available. The calculation is based on an estimate of 222 working days at the interim's agency day rate (excluding VAT) less 30% to cover agency fees and employer's NICs.

	2021–22	2020–21
Banded remuneration of the highest-paid director (£)	120,000–125,000	160,000–165,000 ²¹
First quartile of pay	38,991	35,586
First quartile ratio	3.14	4.57
Median total remuneration	39,785	39,217
Median pay ratio	3.08	4.14
Third quartile of pay	49,602	51,210
Third quartile ratio	2.47	3.17
Range of banded remuneration for employees (£)	20,000–25,000 to 120,000–125,000	20,000–25,000 to 160,000–165,000

²¹ The salary of the highest-paid director in 2020–21 was higher due to the appointment of an interim Executive Director of Corporate Services for a period of five months while the role was recruited into.

The banded remuneration of the highest-paid director in the organisation in the financial year 2021–22 was £120,000 to £125,000 (2020–21 £160,000 to £165,000), this was:

3.14 times (2020–21, 4.57 times) the **first quartile** of remuneration, which was £38,991 (2021–21, £35,586)

3.08 times (2020–21, 4.14 times) the **median** remuneration of the workforce, which was £39,785 (2020–21, £39,217)

2.47 times (2020–21, 3.17 times) the **third quartile** of remuneration, which was £49,602 (2021–21, £51,210).

In 2021–22, no (2020–21; no) employee received remuneration in excess of the highest-paid director.

Compared to 2020–21, the ratios have reduced due to the inclusion of an interim Executive Director in the pay range for 2020–21. Excluding this temporary post, the median ratio calculated using the mid-point of the highest-paid permanent director's band (£127,500 in 2020–21) was 3.25 representing a reduction of 0.17 percentage points, mainly due to a change in the grade mix of employees.

The salary of the highest-paid director in 2020–21 was higher due to the appointment of an interim Executive Director of Corporate Services for a period of five months while the role was recruited into; the remuneration of the highest-paid director reduced by 22.95%. No bonuses or additional allowances were paid to the highest-paid director in either year.

Change in total remuneration	2021–22	2020–21	Change	% Change
Average pay Including bonuses	45,082.51	44,622.30	460.21	1.03
Average pay excluding bonuses	44,721.19	44,237.67	483.52	1.09
Average bonus payment	717.44	478.66	238.78	49.88
No of employees receiving a bonus	139	196	(57)	(29.08)

Average remuneration for all staff increased slightly by 1.03%; this is due to recruitment into higher-grade posts that were vacant in 2020–21.

The average bonus payment increased by 49.88 while the number of recipients reduced by 29%. Bonus payments ranged from £150 to £2,125.

Pension benefits

	Accrued pension at pension age as at 31 March 22 and related lump sum (bands of £5,000) £000	Real increase in pension and related lump sum at pension age (bands of £2,500) £000	CETV at 31 March 22 £000	CETV at 31 March 21 £000	Real increase in CETV £000
Marcial Boo, Chief Executive					
	20–25	0–2.5	285	254	16
Melanie Field, Chief Strategy and Policy Officer					
	45–50 plus a lump sum of 110–115	0–2.5	990	909	24
Cath Denholm, Chief Operating Officer					
	0–5	0–2.5	51	22	21
Alastair Pringle, left the EHRC in July 2021					
	40–45	0–2.5	626	578	23

Civil Service pensions

Pension benefits are provided through the Civil Service pension arrangements. From 1 April 2015, a new pension scheme for civil servants was introduced – the Civil Servants and Others Pension Scheme or **alpha**, which provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age (or 65 if higher). From that date, all newly appointed civil servants and the majority of those already in service joined **alpha**. Prior to that date, civil servants participated in the Principal Civil Service Pension Scheme (PCSPS). The PCSPS has four sections: three providing benefits on a final salary basis (**classic**, **premium** or **classic plus**) with a normal pension age of 60; and one providing benefits on a whole career basis (**nuvos**) with a normal pension age of 65.

These statutory arrangements are unfunded with the cost of benefits met by monies voted by Parliament each year. Pensions payable under classic, **premium**, classic plus, **nuvos** and **alpha** are increased annually in line with Pensions Increase legislation. Existing members of the PCSPS who were within 10 years of their normal pension age on 1 April 2012 remained in the PCSPS after 1 April 2015. Those who were between 10 years and 13 years and 5 months from their normal pension age on 1 April 2012 switch into **alpha** sometime between 1 June 2015 and 1 February 2022.

Because the Government plans to remove discrimination identified by the courts in the way that the 2015 pension reforms were introduced for some members, it is expected that, in due course, eligible members with relevant service between 1 April 2015 and 31 March 2022 may be entitled to different pension benefits in relation to that period (and this may affect the Cash Equivalent Transfer Values shown in this report – see below).

All members who switch to **alpha** have their PCSPS benefits 'banked', with those with earlier benefits in one of the final salary sections of the PCSPS having those benefits based on their final salary when they leave **alpha**. (The pension figures quoted for officials show pension earned in PCSPS or **alpha** – as appropriate. Where the official has benefits in both the PCSPS and **alpha** the figure quoted is the combined value of their benefits in the two schemes.) Members joining from October 2002 may opt for either the appropriate defined benefit arrangement or a defined contribution (money purchase) pension with an employer contribution (**partnership** pension account).

Employee contributions are salary-related and range between 4.6% and 8.05% for members of **classic**, **premium**, **classic plus**, **nuvos** and **alpha**. Benefits in classic accrue at the rate of 1/80th of final pensionable earnings for each year of service. In addition, a lump sum equivalent to three years initial pension is payable on retirement. For **premium**, benefits accrue at the rate of 1/60th of final pensionable earnings for each year of service. Unlike **classic**, there is no automatic lump sum. **Classic plus** is essentially a hybrid with benefits for service before 1 October 2002 calculated broadly as per **classic** and benefits for service from October 2002 worked out as in **premium**. In **nuvos** a member builds up a pension based on his pensionable earnings during their period of scheme membership. At the end of the scheme year (31 March), the member's earned pension account is credited with 2.3% of their pensionable earnings in that scheme year and the accrued pension is uprated in line with Pensions Increase legislation. Benefits in **alpha** build up in a similar way to **nuvos**, except that the accrual rate is 2.32%. In all cases members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004.

The **partnership** pension account is an occupational defined contribution pension arrangement which is part of the Legal & General Mastertrust. The employer makes a basic contribution of between 8% and 14.75% (depending on the age of the member). The employee does not have to contribute but where they do make contributions, the employer will match these up to a limit of 3% of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.5% of pensionable salary to cover the cost of centrally-provided risk benefit cover (death in service and ill health retirement).

The accrued pension quoted is the pension the member is entitled to receive when they reach pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over pension age. Pension age is 60 for members of **classic**, **premium** and **classic plus**, 65 for members of **nuvos**, and the higher of 65 or State Pension Age for members of **alpha**. (The pension figures quoted for officials show pension earned in PCSPS or alpha – as appropriate. Where the official has benefits in both the PCSPS and alpha, the figure quoted is the combined value of their benefits in the two schemes, but note that part of that pension may be payable from different ages.)

Further details about pension arrangements are on the Civil Service Pension Scheme website.

The cash equivalent transfer value

A CETV is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are worked out in accordance with The Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

The real increase in the CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

Civil Service and other compensation schemes: exit packages (this information is subject to audit)

There were no exits under any compensation scheme in 2021–22 (2020–21: none).

Tax arrangements of public sector

In accordance with HM Treasury guidance on disclosure, the following tables set out the number of interim staff and the assurances given about tax status.

All off-payroll engagements as of 31 March 2022, for more than £245 per day and lasting for longer than six months

No engagement met the above criteria	0
--------------------------------------	---

All off-payroll appointments engaged at any point during the year ended 31 March 2022 and earning at least £245 per day

Number of off-payroll workers engaged during the year ended 31 March 2022	6
In-scope of IR35	6
Out-of-scope of IR35	0
Engagements reassessed for compliance or assurance purposes	0
Engagements that changed IR35 status following review	0

Off-payroll engagements of Board members or senior officials with significant financial responsibility, between 1 April 2021 and 31 March 2022

Number of off-payroll engagements of Board members or senior officials with significant financial responsibility, during the financial year.	0
Total number of individuals on payroll and off-payroll who have been deemed 'Board members or senior officials with significant financial responsibility', during the financial year. This figure includes both on payroll and off-payroll engagements.	20

Remuneration and staff report

Staff report

Staff numbers and related cost (average staff numbers and staff costs are subject to audit).

Staff numbers

The number of staff we employed at 31 March 2022 is as follows:

	2021–22		
	Female	Male	Total
Directors (SCS Grade 1–3 equivalent)	3	6	9
Other employees	113	65	178
Other employees (short-term workers)	18	11	29
Directors (SCS Grade 1–3 equivalent) (seconded / loans inwards)	1	1	2
Total	135	83	218
Interims and support workers	5	6	11
Total	140	89	229
Other employees (seconded / loans outwards)	3	2	5
Directors (seconded / loans outward)	-	1	1

As at 31 March 2022, 218 individuals were directly employed by the EHRC on a permanent or fixed-term basis (this was 200 as at 31 March 2021). 11 interim staff and support workers were engaged at 31 March 2022. Six employees were temporarily transferred out of the EHRC, seconded and loaned out of the EHRC at 31 March 2022; all salary costs for such agreements are funded by the receiving organisation.

The average number of FTE employees in post during the year is detailed in the following table

	2021–22	2020–21
Permanently employed staff	173	183
Other		
Short-term contract staff	12	9
Inward secondments	4	3
Agency staff (contracted staff)	4	4
Total	193	199

The average number of FTE employees engaged during the year 2021–22 was 193 (199 during 2020–21), including seconded, loan or agency staff.

Staff costs

	2021-22			2020-21
	Permanently employed staff £000	Others (agency and FTC) £000	Total £000	Total £000
Wages and salaries	7,810	613	8,423	8,815
Social security costs	839	65	904	971
Apprenticeship levy	29	-	29	30
Pension costs	2,134	171	2,305	2,432
Inward secondments	-	169	169	160
Untaken annual leave ²²	(76)	-	(76)	108
Total staff costs	10,736	1,018	11,754	12,516
Recoveries in respect of (outward) secondments ²³	(100)	-	(100)	(181)
Total staff costs (less amount recovered)	10,636	1,018	11,654	12,335
Interim costs	-	253	253	271
Total	10,636	1,271	11,907	12,606

²² Untaken annual leave represents the movement in the accrual based on the calculated cost of leave not taken at 31 March 2022; the decrease is due to the reduction in the number of days staff are permitted to carry over to 10; this had been temporarily increased to 15 days due to the impact of the pandemic.

²³ Represents outward secondments during the reporting period where the employee remains on our payroll but salary costs are fully recovered.

Sickness absence

The sickness absence rate for staff increased compared to 2021–22 and is shown in the table below as average working days lost (AWDL) per FTE.

	AWDL
2021–22 (as at 31 March 22)	5.7
2020–21 (as at 31 March 21)	4.1

Staff turnover

The rate of turnover of permanent staff was 21% in 2021–22 compared with 10% in 2020–21. Along with other public sector and private sector organisations, we have seen an increase in staff turnover as the country emerges from the COVID-19 pandemic. We have taken steps to understand the underlying reasons behind this by providing several different ways to hear from all staff (see below) and by reviewing and improving our processes for offering confidential exit interviews to everyone leaving the organisation.

Employee engagement

The annual People Survey recorded an employee engagement score of 51% for 2021–22, compared with 62% for 2020–21. In response, we carried out an in-depth listening exercise with staff to understand the reasons for the reduction and have agreed a comprehensive set of actions to improve employee engagement as part of our 'Building our Commission' programme. This has included re-establishing the staff forum, which had not met for over 12 months, and establishing a number of new employee networks, as well as commissioning a review of our internal communications function. We held a successful all staff event in March 2022 and have provided the opportunity for all staff to meet together online with the CEO on a fortnightly basis. We are also undertaking regular pulse surveys to gather staff feedback and measure improvement in specific areas where we know staff have expressed concerns. The feedback is reviewed regularly by the Leadership Team, Change Delivery Group and People and Workspace Committee.

Recruitment practices

Recruitment has continued to be a priority this financial year. We made improvements to existing practices and continued the implementation of initiatives to use external partners to support recruitment. We engaged staff using fixed-term appointments and interim contracts to fill gaps in our workforce.

Facility time

The Trade Union (Facility Time Publication Requirements) Regulations 2017 came into force on 1 April 2017 and requires relevant public sector employers, to ‘collate and publish, on an annual basis, a range of data on the amount and cost of facility time within their organisation’.

Facility time is defined in the Regulations as ‘the provision of paid or unpaid time from an employee’s normal role to undertake Trade Union duties and activities as a Trade Union representative’. The tables below show the amount and cost of facility time for 2021–22.

Relevant union officials	2021–22
Number of employees who were relevant union representatives during the relevant period	15
FTE employee number	14

Percentage of time spent on facility time				
Percentage of time	0%	1% – 50%	51% – 99%	100%
Number of employees	0	15	0	0

Percentage of pay bill spent on facility time	
Total cost of facility time £000	13
Total pay bill (staff) £000	11,654
%	0.12%

The regulations require organisations to publish how many hours were spent by trade union officials on paid trade union activities as a percentage of total paid facility time hours. Facility time is paid or unpaid time that trade union officials receive from their normal role to undertake trade union duties and activities.

Paid trade union duties include, for example, preparing for negotiation or consultation and attending meetings; accompanying their trade union members to meetings; and completing training relevant to their trade union role.

'Paid trade union activities' means the time taken off with pay by trade union officials to carry out matters beyond the immediate interest or concern of the EHRC. These activities include, for example, attendance at national executive committee meetings and attendance at trade union conferences.

Paid trade union activities	%
Time spent on paid trade union activities as a percentage of total paid facility time hours	100

Expenditure on consultancy

There was no consultancy spend during 2021–22. This was nil in 2020–21.

People policies

We have comprehensive policies and procedures that encompass the entire employee lifecycle.

Systems are in place to ensure fairness in recruitment. Specialist software is used to anonymise applications for recruiting panels. We operate a guaranteed interview scheme for applicants who meet the minimum criteria with requested reasonable adjustments made at all stages of the process.

All policies and procedures have integrated support for disabled employees, and we make reasonable adjustments wherever possible to aid staff retention and development. Employees are helped to remain in work through policies to support flexible working, annual leave and special or other leave if required. When reasonable adjustments are requested, they are considered and implemented wherever possible.

Employees have access to a comprehensive employee assistance programme and are offered support when required, including independent and confidential occupational health assessments. Employees have access to internal resources such as mental health first aiders.

We recognise and work with the PCS and Unison trade unions and we operate a formal Health and Safety Committee to which both management and trade union representatives are invited.

All staff have access to a range of learning and development resources and agree personal development objectives with their line managers. Employees in eligible categories are encouraged to apply to government positive action programmes to aid personal and career development.

Diversity and inclusion

We continue to promote equality and inclusion for all and we continue to maintain a strong gender profile: 62% of our workforce at 31 March 2022 are female. We have worked to improve the representation of ethnic minority and disabled staff at all levels through improved recruitment practices and developing interviewing skills for staff. In the past year we have seen an increase of 10% in ethnic minority staff and a 1% increase in disabled staff. We have also encouraged staff to declare these characteristics to ensure that we have an accurate picture. Full details of the protected characteristics of staff are provided in the table on page 31.

We are a Disability Confident Leader and have established a number of staff networks that give people the opportunity to support each other and the organisation. These are the:

- Race Equity Network
- LGBTQ+ Network
- Disability Staff Network
- Sustainability Network
- Wellbeing Network
- Social Mobility Network.

We recognise that building an inclusive workforce and incorporating diversity into everything we do is not just about ensuring our people can thrive, but is central to creating a stronger EHRC. The 'Building our Commission' plan has defining the culture and leadership at its core. We work across all three nations and want our workforce to represent the people that the Equality Acts are designed to protect.

We are committed to being an exemplar of how to comply with the Public Sector Equality Duty (PSED). The broad aim of the PSED is to integrate consideration of the advancement of equality into the day-to-day business of all bodies subject to the Duty and places a positive obligation on public bodies to consider how they can eliminate discrimination, advance equality of opportunity and foster good relations in the exercise of their functions. The PSED applies to everyone at the EHRC, in how we work and how we make our decisions. Further information on our areas of priority is on page 33 of this report.

We have produced a practical guide for all colleagues on what the PSED is and the steps we all need to take to comply with it in all areas of our work and at all stages from planning to delivering and evaluation.

Pensions

The Principal Civil Service Pension Scheme (PCSPS) is an unfunded multi-employer defined benefit scheme in which we are unable to identify our share of the underlying assets and liabilities. A full actuarial valuation was carried out as at 31 March 2016. Details are on the **Civil Service Pensions website**.

In 2021–22, employers' contributions of £2,304,330 were payable to the PCSPS (2020–21: £2,426,143) at one of four rates in the range 26.6% to 30.3% (2020–21: 26.6%-30.3%) of pensionable pay, based on salary bands. The scheme actuary reviews employer contributions every four years following a full scheme valuation and the salary bands and contribution rates were revised for 2021–22 as shown above. The contribution rates reflect benefits as they are accrued, not when the costs are actually incurred, and reflect past experience of the scheme.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. Employer contributions are age-related and range from 8.0% to 14.75%. Employers also match employee contributions up to 3% of pensionable pay. No current employees were members of a partnership account in 2021–22.

No employers' contributions were made to appointed stakeholder pension providers in 2021–22 (£6,042 in 2020–21). Subsequently no employer contributions (£183 in 2020–21, representing 0.5% of the member's pensionable pay), were paid to the PCSPS to cover the cost of the future provision of lump sum benefits on death in service and ill-health retirement of these employees. Contributions due to the partnership pension providers at the reporting period date were nil (nil in 2020–21). Contributions prepaid at that date were nil (nil in 2020–21).

There were no early retirements on ill-health grounds (nil in 2020–21).



Parliamentary accountability and audit report

This section summarises the key parliamentary accountability statements within the annual report and accounts and contains the certificate and report of the Comptroller and Auditor General.

Parliamentary accountability and audit report

Parliamentary disclosures (all disclosures are subject to audit)

Losses and special payments:

'Managing Public Money' and the FReM require a statement showing losses and special payments by value and by type to be shown separately where they exceed £300,000 in total, and those individually that exceed £300,000. There were no losses or special payments in 2021–22 that require disclosure in the Annual Report and Accounts (none in 2020–21).

Remote contingent liabilities:

There are no contingent liabilities to be disclosed under the Parliamentary reporting requirements.

Long-term expenditure trends:

A summary of current and prior year performance is included within the performance section of this report.

Fees and charges:

The EHRC does not have the ability to raise income through the levy of fees or charges.



Marcial Boo

Chief Executive and Accounting Officer

11 July 2022

Parliamentary accountability and audit report

Audit Certificate

The certificate and report of the comptroller and auditor general to the Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the Commission for Equality and Human Rights (trading as the Equality and Human Rights Commission) for the year ended 31 March 2022 under the Equality Act 2006.

The financial statements comprise the Commission's

- Statement of Financial Position as at 31 March 2022;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted International Accounting Standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Commission's affairs as at 31 March 2022 and its net expenditure for the year then ended; and
- have been properly prepared in accordance with the Equality Act 2006 and Secretary of State directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis of opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 'Audit of Financial Statements and Regularity of Public Sector Entities in the United Kingdom'. My responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of my certificate

Those standards require me and my staff to comply with the Financial Reporting Council's Revised Ethical Standard 2019. I have also elected to apply the ethical standards relevant to listed entities. I am independent of the Commission for Equality and Human Rights in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Commission's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Commission's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Commission for Equality and Human Rights is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which require entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other information

The other information comprises information included in the Annual Report, but does not include the financial statements nor my auditor's certificate thereafter. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

In connection with my audit of the financial statements, my responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with Secretary of State directions issued under the Equality Act 2006.

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with Secretary of State directions issued under the Equality Act 2006; and
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the Commission for Equality and Human Rights and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Report.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- I have not received all of the information and explanations I require for my audit; or
- adequate accounting records have not been kept by the Commission for Equality and Human Rights or returns adequate for my audit have not been received from branches not visited by my staff; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited are not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Commission and Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Commission and Accounting Officer are responsible for:

- maintaining proper accounting records;
- the preparation of the financial statements and Annual Report in accordance with the applicable financial reporting framework and for being satisfied that they give a true and fair view;
- ensuring that the Annual Report and accounts as a whole is fair, balanced and understandable;
- internal controls as the Accounting Officer determines is necessary to enable the preparation of financial statement to be free from material misstatement, whether due to fraud or error; and
- assessing the Commission's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Commission for Equality and Human Rights will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Equality Act 2006.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, we considered the following:

- the nature of the sector, control environment and operational performance including the design of the Commission's accounting policies.
- Inquiring of management, the Commission's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Commission's policies and procedures relating to:

- identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Commission's controls relating to the Commission's compliance with the Equality Act 2006 and Managing Public Money
- discussing among the engagement team and involving relevant external specialists, including pensions expertise, regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Commission for Equality and Human Rights for fraud and identified the greatest potential for fraud in the following areas: fraud in expenditure recognition, and posting of unusual journals. In common with all audits under ISAs (UK), I am also required to perform specific procedures to respond to the risk of management override of controls.

I also obtained an understanding of the Commission's framework of authority as well as other legal and regulatory frameworks in which the Commission for Equality and Human Rights operates, focusing on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Commission for Equality and Human Rights. The key laws and regulations I considered in this context included the Equality Act 2006, Managing Public Money, employment law, pensions legislation and tax legislation.

In addition, I considered other risk assessment procedures relating to fraud, non-compliance with laws and regulations and regularity including review of Commissioner meeting minutes; attending the Audit and Risk Assurance Committee; enquiries of management, internal audit and those charged with governance; review of significant and unusual transactions; and review of segregation of duties and mitigating controls.

Audit response to identified risk

As a result of performing the above, the procedures I implemented to respond to identified risks included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- enquiring of management, the Audit and Risk Assurance Committee and in-house legal counsel concerning actual and potential litigation and claims;
- reading and reviewing minutes of meetings of those charged with governance and the Commission and internal audit reports;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments;
- assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and
- evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located [on the Financial Reporting Council's website](#). This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain evidence sufficient to give reasonable assurance that the income and expenditure reported in the financial statements have been applied to the purposes intended by Parliament and the financial transactions conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identify during my audit.

Report

I have no observations to make on these financial statements.

Gareth Davies,
Comptroller and Auditor General

Date: 12 July 2022

National Audit Office
157-197 Buckingham Palace Road
Victoria, London
SW1W 9SP



Statement of accounts

These accounts are presented to Parliament pursuant to paragraph 40 of Schedule 1 to the Equality Act 2006.

The Equality and Human Rights Commission (EHRC) is a statutory non-departmental public body established under the Equality Act 2006. Its powers and duties are described in the 2006 and 2010 Equality Acts.

These accounts are prepared in accordance with the Government Financial Reporting Manual (FReM) and International Financial Reporting Standards (IFRS).

Statement of accounts

Primary Statements

The Primary Statements within the Statement of Accounts include the Statement of Comprehensive Net Expenditure, the Statement of Financial position (Balance Sheet), the Cashflow Statement and the Statement of Taxpayer's Equity. The Primary Statements are complemented by the subsequent notes.

The Statement of Comprehensive Net Expenditure shows the cost for the year of the EHRC's activities, it essentially captures the inflow and outflow of resources for the financial year up to 31 March, which have been received or incurred as part of the ordinary activities of the EHRC.

The Statement of Financial Position (Balance Sheet) is a statement showing the EHRC's assets and liabilities: that is, what is owned and what is owed as at 31 March 2022. The net impact of this is funded by taxpayers' equity which is received as funding from our sponsor body.

The Cashflow Statement shows the changes in cash and cash during the financial year. Investing activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the EHRC's infrastructure.

Statement of accounts

Statement of comprehensive net expenditure (SoCNE) for the year ended 31 March 2022

	Note	2021-22 £000	2020-21 £000
Income			
Operating income	4	(145)	(168)
Total operating income		(145)	(168)
Expenditure			
Staff costs	3	11,907	12,606
Commissioner and committee costs	3	292	260
Purchase of goods and services	3	4,508	4,040
Depreciation and impairment charges	3	601	512
Provision expense	3	204	17
Total operating expenditure		17,512	17,435
Net operating expenditure		17,367	17,267
Interest cost on pension scheme liabilities	12	17	25
Net expenditure for the year		17,384	17,292
Other comprehensive net expenditure			
Items which will not be classified to net operating costs:			
- net (gain) / loss on revaluation of property, plant and equipment	5	(25)	1
- net (gain) / loss on revaluation of intangible assets	6	1	3
- actuarial loss / (gain) on pension scheme liabilities	12	120	39
Comprehensive net expenditure for the year		17,480	17,335

The notes on pages 101 to 132 form part of these accounts

Statement of accounts

Statement of financial position as at 31 March 2022

	Note	31 March 2022 £000	31 March 2021 £000
Non-current assets			
Property, plant and equipment	5	940	882
Intangible assets	6	172	319
Trade and other receivables	9	54	58
Total non-current assets		1,166	1,259
Current assets			
Trade and other receivables	9	666	690
Cash and cash equivalents	8	375	85
Total current assets		1,041	775
Total assets		2,207	2,034
Current liabilities			
Trade and other payables	10	(2,015)	(1,656)
Dilapidations Provision	11	(343)	-
Pension liabilities	12	(105)	(100)
Total liabilities		(2,463)	(1,756)
Total assets less liabilities		(256)	278
Non-current liabilities			
Trade and other payables	10	-	(20)
Dilapidations Provision	11	(89)	(228)
Pension liabilities	12	(1,316)	(1,325)
Total non-current liabilities		(1,405)	(1,573)
Total assets less total liabilities		(1,661)	(1,295)
Taxpayers' equity			
Revaluation reserve	SoCTE	51	63
General reserve	SoCTE	(1,712)	(1,358)
Total equity		(1,661)	(1,295)

The notes on pages 101 to 132 form part of these accounts



Marcial Boo,
Chief Executive and Accounting Officer
11 July 2022

Statement of accounts

Statement of cash flows for the year ended 31 March 2022

	Note	2021-22 £000	2020-21 £000
Cash flows from operating activities			
Net expenditure	SoCNE	(17,384)	(17,292)
Adjustments for non-cash transactions	5&6	601	512
(Increase) / decrease in trade and other receivables	9	29	(55)
Increase / (decrease) in trade and other payables	10	339	79
Movement in provisions	11	204	17
Difference between movement on pension liabilities and amounts recognised in the SoCNE	12	(124)	(74)
Net cash outflow from operating activities		(16,335)	(16,813)
Cash flows from investing activities			
Purchase of non-financial assets	5&6	(490)	(385)
Net cash outflow from investing activities		(490)	(385)
Cash flows from financing activities			
Grant-in-aid received from sponsoring department		17,115	17,098
Net financing		17,115	17,098
Net increase / (decrease) in cash and cash equivalents in the period	8	290	(100)
Cash and cash equivalents at the beginning of the period	8	85	185
Cash and cash equivalents at the end of the period	8	375	85

The notes on pages 101 to 132 form part of these accounts

Statement of accounts

Statement of changes in taxpayers' equity (SoCTE) for the year ended 31 March 2022

	Note	Revaluation reserve £000	General reserve £000	Total £000
Balance at 31 March 2020		62	(1,127)	(1,065)
Grant-in-aid received from sponsoring department – cash draw down		-	17,098	17,098
Net expenditure for the year	9	-	(17,292)	(17,292)
Remeasurements – actuarial gain / loss on pension scheme liabilities	9	-	(39)	(39)
Revaluation of PPE and intangibles	9	6	(3)	3
Transfer between reserves	9	(5)	5	-
Balance at 31 March 2021		63	(1,358)	(1,295)
Grant-in-aid received from sponsoring department – cash draw down	SoCF	-	17,115	17,115
Net expenditure after interest for the year	SoCNE	-	(17,384)	(17,384)
Remeasurements – actuarial gain / loss on pension scheme liabilities	12	-	(120)	(120)
Revaluation of PPE and intangibles	5&6	23	-	23
Transfer between reserves	5&6	(35)	35	-
Balance at 31 March 2022		51	(1,712)	(1,661)

The notes on pages 101-132 form part of these accounts

Notes to the financial statements for the period ending 31 March 2022

1 Accounting policies

The Equality and Human Rights Commission is a statutory non-departmental public body sponsored by the UK Government's Minister for Women and Equalities established by the Equality Act 2006. It operates independently from Government and Parliament, and is Britain's national equality body.

We operate from four offices across Britain located in:

- London – Third Floor, Windsor House, Victoria Street, SW1H 0TL
- Manchester – Arndale House, Arndale Centre, M4 3AQ
- Cardiff – The Maltings, 3 East Tyndall Street, CF24 5EZ, and
- Glasgow – 151 West George Street, G2 2JJ.

These financial statements have been prepared in a form consistent with the Accounts Direction issued by the Secretary of State in accordance with the Equality Act 2006, and in accordance with the Government Financial Reporting Manual (FReM) as issued by HM Treasury.

The accounting policies described in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector. Where the FReM permits a choice of accounting policy, we have selected the accounting policy judged to be most appropriate to the particular circumstances of our organisation for the purpose of giving a true and fair view. The policies we have adopted are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

Figures in the financial statements are rounded to the nearest £000 unless otherwise stated.

There were no changes to accounting policies during 2021–22.

1.1 Accounting convention

These financial statements have been prepared under the historical cost convention modified to account for the revaluation of property, plant and equipment and intangible assets where material.

1.2 Going concern

The financial statements have been prepared on a going-concern basis. This is based on the assessment that the EHRC will continue to receive funding through grant-in-aid from the sponsoring department, the Cabinet Office and operations will continue for the foreseeable future. This assessment has also considered that, for non-trading public sector entities like EHRC the FReM provides that 'the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents, is normally sufficient evidence of going concern.'

The Equality Act 2006 requires the Secretary of State to provide sufficient funding for us to carry out our statutory functions and as an arms-length body sponsored by the Cabinet Office, the EHRC has no reason to assume that future funding will not be forthcoming. Our going concern assessment is made up to 12 months from signing date. The EHRC has assumed that funding will continue beyond the 2022-23 financial year broadly in line with current levels and modelling of future cash flows demonstrates that the organisation will have sufficient available cash to meet needs for the period of our assessment.

The Framework agreement between the EHRC and the Cabinet office provides assurance that in the event of the EHRC being wound up any assets or liabilities of the EHRC will be passed to a successor organisation or to the Cabinet Office if there is no successor body.

In conclusion, these factors, and the anticipated future provision of services in the public sector, support the EHRC's adoption of the going concern basis for the preparation of the accounts.

1.3 Accounting judgements and key sources of estimation uncertainty

In the application of our accounting policies and the preparation of financial statements management is required to make judgements, estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. The estimates and underlying assumptions are continually reviewed. The nature of estimation, however, means that actual outcomes could differ from those estimates and could cause adjustment to the carrying amounts of assets and liabilities within the next financial year.

Areas of estimation uncertainty

The following are the key assumptions concerning the future and other key sources of estimation uncertainty at the time of the statement of our financial position:

- **Provisions:** Dilapidations provisions are based on professional estimations provided by third parties, discount rates for provisions are set by HM Treasury, are updated annually and may have an effect on liabilities disclosed.
- **Retirement benefit obligations:** The former Chairs' pension scheme is unfunded and exposes us to uncertainty arising from the actuarial valuation of the scheme, which uses factors such as changes in life expectancy and discount rates to calculate the scheme's total liability.

1.4 Newly issued IFRS not yet effective

New or amended standards are implemented in line with their adoption by the FReM.

IFRS16 Leases becomes effective for reporting periods beginning on or after 1 April 2022 for the public sector bodies who have not already implemented the standard. The standard provides a single lessee accounting model, requiring lessees to recognise assets and liabilities for all leases unless the lease term is 12 months or less or the underlying asset has a low value. Lessors continue to classify leases as operating or finance with IFRS 16's approach to lessor accounting substantially unchanged from its predecessor, IAS 17.

Following the adoption of IFRS 16 from 1 April 2022 the initial recognition of the leases creates a Right of Use (ROU) asset and corresponding lease liability for leases that are assessed to fall under the requirements of IFRS 16 (this excludes leases with a term of less than 12 months and those where the underlying asset is of low value).

The EHRC's current lease commitments across the minimum contractual terms at 1 April 2022 are assessed as:

	£000
Those with a duration of less than 12 months outside the scope of IFRS 16	219
Those with a length of greater than 12 months at within scope of IFRS 16	560
	779

The table below reconciles the current leases within the scope of IFRS 16 immediately on adoption.

	£000
Operating lease commitments disclosed at 31 March 2022	779
Adjustments from IAS 17 to IFRS 16	
- Less short term leases (with a length of less than 12 months at 1 April 2022)	(219)
- Impact of discounting	(9)
IFRS 16 opening balance of existing lease liabilities	551

The immediate impact on the 2022–23 financial statements of leases in place at 1 April 2022 summarised below:

	£000
Right of use asset opening value	551
Right of use asset lease liability opening value	(551)

Statement of Comprehensive Net Expenditure (2022–23 impact)

	IAS 17 £000	IFRS 16 impact £000	IFRS 16 £000
Purchase of Goods and Services (lease payments)	224	(224)	-
Interest (calculated on total lease liability)	-	5	5
Depreciation charges (reduction in value of ROU asset)	-	220	220

During 2022–23 the EHRC intends to enter into new lease agreements for premises in Glasgow and Cardiff, both of which will have a term greater than 12 months and will be within the scope of IFRS 16. The impact of these will be calculated at the point that the lease agreement is signed.

IFRS17 Insurance contracts replace IFRS 4 Insurance contracts and is expected to become effective for public sector bodies in 2025–26. Our assessment is that this will have no impact on our financial statements because we do not enter into insurance contracts.

There are no other IFRS interpretations not yet effective that would be expected to have material impact on the EHRC financial statements

No standards have been adopted early.

1.5 Grant-in-aid

The FReM requires the EHRC to account for grant-in-aid received as financing and to credit this to taxpayers' equity. This is due to grant-in-aid being regarded as a contribution from a controlling party, which gives rise to a financial interest in the residual interest of our organisation.

Grant-in-aid received for purchasing non-current assets is also credited to taxpayers' equity.

1.6 Employee benefits

Benefits payable during employment

Under 'IAS19: Employee benefits', staff benefits including salaries, paid leave and sick leave are recognised as an expense in the year in which the service takes place.

Performance payments are paid in arrears during the subsequent financial year; the cost of these is recognised on an accruals basis at the end of the financial year and is calculated as a fixed proportion of the total pay bill, which represents the maximum amount that can be paid out.

Employee leave accrual

An accrual based on the salary rates applicable at 31 March is made for any annual leave entitlement earned but not taken at the year-end which employees can carry forward into the next financial year.

1.7 Operating segments

Operating segments (note 2) are based on the main reporting areas of our organisation (Networks) and align with our internal reporting. Since segmental information for assets and liabilities is not reported to the chief operating decision-maker at a segmental level, these are not included in the segmental reporting analysis.

The chief operating decision maker has been identified as the Accounting Officer.

1.8 Recognition of income and expenditure

Activity is accounted for in the year in which it takes place and is recognised in the financial statements on an accruals basis.

Expenses from services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are made.

Operating income is principally the recovery (either full or partial) of costs incurred from other parties. Income is recognised when the transaction can be reliably measured and it is probable that economic benefits associated with the transaction will flow to the EHRC.

Where income and expenditure has been recognised but cash has not been received or paid, a receivable or payable for the relevant amount is recorded in our statement of financial position

1.9 Prepayments

Prepayments for goods and services which are to be provided in future periods are recorded as assets in our statement of financial position and recognised as an expense either when the goods or service are received or over the life of the agreement.

Items are recognised for prepayment if the total cost exceeds £100, items include:

- Where a contractual obligation exists to pay for goods or services in advance of consumption (for example building lease charges) the cost is expensed over the period of the charge.
- Licence costs, subscriptions and maintenance agreements which are paid in full in advance are expensed across the duration of the agreement.

1.10 Property, plant and equipment

Recognition

Expenditure on the acquisition, creation or enhancement of property, plant and equipment is capitalised on an accruals basis, provided that a future economic benefit can be recognised, where the expected useful lives of the assets exceeds one year and that the cost of the item can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (for example, for repairs and maintenance) is charged as an expense when it is incurred.

A £3,000 de minimis limit for capital expenditure is applied, either individually or in related groups of similar assets.

All property, plant and equipment is measured initially at cost, representing the cost attributable to acquiring the asset and bringing it into use in the manner intended

by management. Assets that are held for their service potential and are in use are measured subsequently at their current value in existing use.

All assets are restated at current value each year using producer price indices published by the Office for National Statistics, which are deemed to be the most appropriate valuation methodology available. Any gain on revaluation is credited to the revaluation reserve. Any loss is debited to the revaluation reserve to the extent that a gain has previously been recorded, and otherwise to the statement of comprehensive net expenditure.

Depreciation

Property, plant and equipment is depreciated over its estimated useful economic using the straight-line basis commencing when the asset is placed in service. All assets' residual values, useful lives and method of depreciation are reviewed at each financial reporting year end and adjusted if appropriate.

We estimate the useful economic lives of assets as follows:

- **Fit-out costs (leasehold improvements) for premises:** the lower of the useful economic life of the fit-out costs and the life of the lease.
- **Office furniture:** 10 to 15 years.
- **Computer and networking equipment, telephones hardware:** 2 to 7 years.

Impairment

International Accounting Standard (IAS) 36, Impairment of Assets, has been adapted in the FReM.

Impairments that are due to a clear consumption of economic benefit should be recognised in the statement of comprehensive net expenditure, rather than set against an available revaluation reserve.

Where impairment losses are identified that are not due to consumption, they are accounted for as follows:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is charged to the statement of comprehensive net expenditure.

Where asset revaluations cause impairment, an assessment is carried out to determine whether the impairment is due to consumption of economic benefit and should be recognised in the statement of comprehensive net expenditure.

Disposals

When an asset is disposed of or decommissioned, the carrying amount of the asset is charged to the statement of comprehensive net expenditure as a loss on disposal. Net gains from disposals are credited to the statement of comprehensive net expenditure (that is, netted off against the carrying value of the asset at the time of disposal).

1.11 Intangible assets

Recognition

Intangible assets are acquired computer software licences and costs incurred in the development phase of internal computer software projects.

Intangible assets are recognised at cost initially, assets are revalued annually using producer price indices published by the Office for National Statistics, which is deemed to be the most appropriate valuation methodology. Any gain on revaluation is credited to the revaluation reserve. Any loss is debited to the revaluation reserve to the extent that a gain has been recorded previously, and otherwise to the statement of comprehensive net expenditure.

Costs incurred in the developmental phase of internal software projects are only capitalised if they are associated directly with the production of identifiable computer software programs controlled by our organisation that would generate economic benefits beyond one year, and provided that a number of criteria are satisfied. These include the technical feasibility of completing the asset so that it is available for use, the availability of adequate resources to complete the development and use the asset, and how the asset will generate future economic benefit.

Other costs associated with developing or maintaining computer software programmes are recognised as an expense when incurred.

Amortisation

Intangible assets are amortised over the estimated useful economic life of the asset using the straight-line basis, commencing at the point the asset is placed in service. Assets are assessed on an individual basis and an appropriate life applied dependent on the characteristics of the asset according to the following:

- software and associated services are assessed over the term of the software licence, and
- information technology assets are assessed over five years or over the unexpired time of the software licence (whichever is shorter).

Impairment

International Accounting Standard (IAS) 36, Impairment of Assets, has been adapted in the FReM.

Impairments that are due to a clear consumption of economic benefit should be recognised in the statement of comprehensive net expenditure, rather than set against an available revaluation reserve.

Where impairment losses not due to consumption are identified, they are accounted for as follows:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is charged to the statement of comprehensive net expenditure.

Where asset revaluations give rise to impairment, an assessment is carried out to determine if the impairment is due to consumption of economic benefit and should be recognised in the statement of comprehensive net expenditure.

Disposals

When an asset is disposed of or decommissioned, the carrying amount of the asset is charged to the statement of comprehensive net expenditure as a loss on disposal. Receipts from disposals are credited to the statement of comprehensive net expenditure as a gain on disposal (that is, netted off against the carrying value of the asset at the time of disposal).

1.12 Provisions, contingent liabilities and contingent assets

Provisions

In accordance with IAS 37 provisions are recognised when a legal or constructive obligation from a past event arises and an outflow of economic benefits will probably be required to settle the obligation, and the amount of the obligation can be assessed reliably.

For legal costs a provision is made when there is a probability of greater than 50% that the case will be lost and being ordered to pay costs. Legal cases are taken on by the EHRC to challenge and clarify the law, which may result in adverse judgement being made. The probability assessment is carried out on a case-by-case basis, taking the advice of external legal experts.

For dilapidations, a provision is made for the estimated costs of returning premises to their original condition at the end of the lease period where there is an obligation contained in the lease. Where a value is not stated the provision is calculated utilising a rate per square foot based on a professional valuation.

Where an annual assessment is not provided, provisions are discounted according to the HM Treasury discount rate (indicated in the table below) when their use is expected to be more than a year from the date of creation.

HMT General provisions discount rates

	2021–22 £000	2020–21 £000
Short-term: applied on cash flows from up to and including five years from the date of the Statement of Financial Position	0.47	(0.02)
Medium-term: applied on cash flows from after five and up to and including 10 years from the date of the Statement of Financial Position	0.70	0.18

Contingent liabilities

A contingent liability arises where an event has taken place that gives the EHRC a possible obligation which will only be confirmed by the occurrence or otherwise of uncertain future events not wholly under the EHRC's control. Contingent liabilities also occur when a provision would otherwise be made but it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the financial statements but are disclosed in a note to the accounts.

Contingent assets

A contingent asset arises where an event has taken place that gives rise to a possible asset which will only be confirmed by the occurrence or otherwise of uncertain future events not wholly under our control.

Contingent assets are not recognised in the financial statements but disclosed in a note to the accounts when it is probable that there will be an inflow of economic benefits or service potential.

1.13 Access to Work scheme

The Access to Work scheme, run by the Department for Work and Pensions (DWP), considers if any reasonable adjustments are required for a person to do their job. If a member of staff has an agreement in place which provides part-funding for equipment or services the EHRC agrees to make up any shortfall.

1.14 Pensions

Current and former employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS) and the Civil Servants and Other Pension Scheme (CSOPS) and are accounted for as defined contribution scheme despite being defined benefit schemes. Liability for payment of future benefits is a charge on the PCSPS / CSOPS.

Pension benefits for former Chairs of our organisation and legacy organisations are provided under a 'broadly by analogy' scheme. The scheme disclosures are stated in accordance with IAS 19, Employee Benefits. This scheme is an unfunded defined-benefit scheme managed by the Home Office Shared Service Centre, and any pensions are administered by it in accordance with the standard rules (by analogy with the PCSPS).

Where actuarial gains and losses arise from changes to actuarial assumptions when revaluing future benefits, and from actual experience in respect of scheme liabilities and investment performance of scheme assets being different from previous assumptions, then the actuarial gains and losses are recognised directly in taxpayers' equity for the year.

1.15 Leases

In line with the FReM and HMT requirements, EHRC will adopt IFRS 16 effective from 1 April 2022. For the financial year ended March 2022 leases have been treated in line with IAS 17 where they are identified as either finance leases or operating leases based on the substance of the transaction rather than the underlying contract.

Leases are classed as finance leases where the terms of the lease transfer the majority of the risks and rewards incidental to ownership of the property, plant or equipment from the lessor to the lessee.

All other leases are classified as operating leases. Operating leases and lease incentive (periods of rent-free occupation) are charged to the (SoCNE) on a straight-line basis over the life of the lease; the organisation currently occupies buildings under operating leases where the landlord charges for rent and associated services

The EHRC does not hold any finance leases.

1.16 Related-party transactions

The EHRC is required to disclose material transactions with related parties, bodies or individuals that have the potential to control or influence our organisation or to be controlled or influenced by us.

Disclosure of these transactions allows readers to assess how the EHRC might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely.

1.17 Events after the reporting period

Events after the reporting period are those, both favourable and unfavourable, that occur between the end of the reporting period and the date when the statement of accounts is authorised for issue. Two types of events can be identified:

- **Adjusting events:** Those events that provide evidence of conditions that existed at the end of the reporting period – the statement of accounts is adjusted to reflect such events.
- **Non-adjusting events:** Those events that are indicative of conditions that arose after the reporting period – the statement of accounts is not adjusted to reflect such events. However, where a category of events would have a material effect, disclosure is made in the notes regarding the nature of the events and either their estimated financial effect or a statement that such an estimate cannot be made reliably.

2 Statement of outturn by operating segment

Our operations are divided into networks, each led by a Senior Officer. These networks and the teams included in each are summarised below.

Chief Operating Officer Network

Teams

- Communications and Correspondence
- Estates and Facilities
- People
- Finance, Procurement, and Governance
- Information Technology
- International
- Scotland (including the Scotland Committee)

Strategy and Policy Network

Teams

- Policy
- Strategy
- Human Rights monitoring
- Wales (including the Wales Committee)
- Evidence and Data

Regulation Network

Teams

- Compliance
- Legal and Enforcement
- Corporate Law
- Information Governance

2021–22	Gross expenditure £000	Income £000	Net expenditure £000
Chief Operating Officer	8,717	(112)	8,605
Regulation	5,121	(31)	5,090
Strategy and Policy	3,073	(2)	3,071
Total operating expenditure	16,911	(145)	16,766
Depreciation and amortisation charge	601	-	601
Interest cost on pension scheme liabilities	17	-	17
Total net expenditure	17,529	(145)	17,384

The 2020–21 totals in the table below have been amended to provide comparatives for the previous year.

2020–21 (represented)	Gross expenditure £000	Income £000	Net expenditure £000
Chief Operating Officer	8,297	(145)	8,152
Regulation	5,458	(22)	5,436
Strategy and Policy	3,168	(1)	3,167
Total operating expenditure	16,923	(168)	16,755
Depreciation and amortisation charge	512	-	512
Interest cost on pension scheme liabilities	25	-	25
Total net expenditure	17,460	(168)	17,292

Capital expenditure, assets and liabilities are not reported to the chief operating decision-maker at a segmental level and have not therefore been included in this table.

3 Expenditure

	Year ended 31 March 2022 £000	Year ended 31 March 2021 £000
Staff costs		
Wages and salaries	8,423	8,815
Social security costs	904	971
Apprentice Levy	29	30
Pension costs	2,305	2,432
Untaken annual leave	(76)	108
Inward secondments	169	160
Recoveries in respect of outward secondments	(100)	(181)
Agency staff	253	271
Chair's and Commissioners' fees and expenses	292	260
Total staff costs²⁴	12,199	12,866

²⁴ Further detail is provided in the 'Remuneration and staff report' (page 59).

3 Expenditure (continued)	Year ended 31 March 2022 £000	Year ended 31 March 2021 £000
Purchase of goods and services		
ICT and Telecommunications	740	684
Support and Office Services	682	352
Premises costs (non-lease)	653	725
Rentals under operating leases	605	597
Staff support, recruitment and training	515	205
Research and policy development	475	307
Travel and Subsistence	101	5
Publication and information	300	396
Legal	236	525
Advisory Services	86	132
Access to Work	60	56
Auditor's remuneration ²⁵	55	56
Total purchase of goods and services	4,508	4,040

²⁵ No non-audit services were provided by the external auditors.

3 Expenditure (continued)	Year ended 31 March 2022 £000	Year ended 31 March 2021 £000
Non-cash items		
Depreciation of property, plant and equipment	432	393
Amortisation of intangible assets	153	119
Revaluation of property, plant and equipment and intangible assets	16	-
Provision expense	203	14
Borrowing costs of provisions (unwinding of discount on provisions)	1	3
Total operating expenditure	17,512	17,435
Interest cost on pension scheme liabilities	17	25
Total expenditure	17,529	17,460

4 Income

	Year ended 31 March 2022 £000	Year ended 31 March 2021 £000
Grants received	112	120
Lease income	-	21
Access to Work scheme	31	26
Other income	2	1
Total income	145	168

5 Plant, property and equipment

2021–22	Leasehold improvement ²⁶ £000	IT and telecoms equipment £000	Furniture £000	Payments on account and assets under construction £000	Total £000
Cost or valuation					
At 1 April 2021	1,621	1,510	448	213	3,792
Additions in year	193	241	34	-	468
Disposals	(573)	(481)	(156)	-	(1,210)
Reclassifications and transfers	41	165	-	(206)	-
Revaluations	75	(18)	18	-	75
At 31 March 2022	1,357	1,417	344	7	3,125
Depreciation					
At 1 April 2021	1,411	1,251	248	-	2,910
Charge in year	168	214	51	-	433
Disposals	(573)	(481)	(156)	-	(1,210)
Revaluations	59	(14)	7	-	52
At 31 March 2022	1,065	970	150	-	2,185
Carrying value					
At 31 March 2021	210	259	200	213	882
At 31 March 2022	292	447	194	7	940

Payments on account and assets under construction include ICT equipment currently being configured.

These amounts include accruals and do not necessarily represent a cash outflow in the current year.

²⁶ Leasehold improvement costs include the costs of fitting out premises that are occupied under a lease; such assets are depreciated over the term of the lease.

5 Plant, property and equipment (continued)

2020–21	Leasehold improvement £000	IT and telecoms equipment £000	Furniture £000	Payments on account and assets under construction £000	Total £000
Cost or valuation					
At 1 April 2020	1,614	1,439	439	16	3,508
Additions in year	-	65	7	206	278
Disposals	-	-	-	-	-
Reclassifications and transfers	-	9	-	(9)	-
Revaluations	7	(3)	2	-	6
At 31 March 2021	1,621	1,510	448	213	3,792
Depreciation					
At 1 April 2020	1,238	1,054	221	-	2,513
Charge in year	167	199	26	-	392
Disposals	-	-	-	-	-
Revaluations	6	(2)	1	-	5
At 31 March 2021	1,411	1,251	248	-	2,910
Carrying value					
At 31 March 2020	376	385	218	16	995
At 31 March 2021	210	259	200	213	882

6 Intangible assets

2021–22	Software £000	Payments on account and assets under construction £000	Total £000
Cost or valuation			
At 1 April 2021	582	-	582
Additions	22	-	22
Disposals	(173)	-	(173)
Reclassification	-	-	-
Revaluations	(33)	-	(33)
At 31 March 2022	398	-	398
Amortisation			
At 1 April 2021	263	-	263
Charge in year	153	-	153
Disposals	(173)	-	(173)
Revaluations	(17)	-	(17)
At 31 March 2022	226	-	226
Carrying value			
At 31 March 2021	319	-	319
At 31 March 2022	172	-	172

6 Intangible assets (continued)

2020–21	Software £000	Payments on account and assets under construction £000	Total £000
Cost or valuation			
At 1 April 2020	346	186	532
Additions	106	-	106
Disposals	(63)	-	(63)
Reclassification	186	(186)	-
Revaluations	7	-	7
At March 2021	582	-	582
Amortisation			
At 1 April 2020	202	-	202
Charge in year	119	-	119
Disposals	(63)	-	(63)
Revaluations	6	-	6
At March 2021	264	-	264
Carrying value			
At 31 March 2020	144	186	330
At 31 March 2021	319	-	319

7 Financial instruments

Due to the EHRC's cash requirements being met through the estimate process of our sponsoring department, financial instruments play a more limited role in creating and managing risk than would apply in a non-public-sector body. The majority of financial

instruments we hold relate to contracts to buy non-financial items in line with our expected purchase and usage requirements, therefore the exposure to credit, liquidity and market risk is considered minimal.

8 Cash and cash equivalents

	2021–22 £000	2020–21 £000
Balance at 1 April	85	185
Net change in cash and cash equivalent balances	290	(100)
Balance at 31 March	375	85

All balances were held with the Government Banking Service

9 Trade receivables, financial and other assets

	2021–22 £000	2020–21 £000
Amounts falling due within one year		
Receivables	8	12
Prepayments	588	603
Accrued income	70	18
Contract assets	-	57
Total	666	690
Amounts falling due after one year		
Prepayments	54	58
Total receivables	720	748

10 Trade payables and other current liabilities

	2021–22 £000	2020–21 £000
Amounts falling due within one year		
Accruals	715	557
Trade payables	462	226
Other taxation and social security	279	250
Holiday pay accrual	274	349
Pension payments	252	237
Rent-free accrual	20	27
Contract liabilities and deferred income	6	1
VAT	7	9
Total falling due within one year	2,015	1,656
Amounts falling due after one year		
Rent-free accrual	-	20
Total payables	2,015	1,676

11 Provisions for liabilities and charges

2021–22	Dilapidation provision £000	Total provisions £000
Balance at 1 April 2021	228	228
Provided in year	203	203
Provisions not required / written back	-	-
Unwinding of discount rate	-	-
Change in discount rate	1	1
Balance at 31 March 2022	432	432

2021–22 Ageing of provisions	Dilapidation provision £000	Total provisions £000
Not later than one year	343	343
Later than one and not later than five years	89	89
Later than five years	-	-
Total	432	432

11 Provisions for liabilities and charges (continued)

2020–21	Dilapidation provision £000	Total provisions £000
Balance at 1 April 2020	211	211
Provided in year	14	14
Provisions not required / written back	-	-
Unwinding of discount rate	2	2
Change in discount rate	1	1
Balance at 31 March 2021	228	228

2020–21 Ageing of provisions	Dilapidation provision £000	Total provisions £000
Not later than one year	-	-
Later than one and not later than five years	228	228
Later than five years	-	-
Total	228	228

12 Pension liabilities (retirement benefit obligations)

Pension liabilities comprise pension benefits for the former Chair of the EHRC and former Chairs and Deputy Chairs of legacy Commissions. The benefits are provided under a scheme broadly by analogy with the PCSPS.

The pension scheme is unfunded, with benefits being paid as they fall due and guaranteed by our organisation. There is no fund and therefore no surplus, deficit or assets. The Government Actuary's Department, using the financial assumptions in the tables below, has calculated the scheme liabilities at 31 March 2022.

Assumptions	31 March 2022 %	31 March 2021 %
Rate used to discount scheme liabilities	1.55	1.25
Rate of inflation: Consumer Prices Index	2.90	2.22
Rate of increase for pensions in payment and deferred pensions	2.90	2.22

Liabilities	31 March 2022 £000	31 March 2021 £000
Active members (past service)		
Deferred pensioners	-	142
Current pensioners	1,421	1,283
Net present value of scheme liabilities	1,421	1,425

Analysis of movement in scheme liability	2021–22 £000	2020–21 £000
Balance at 1 April	1,425	1,460
Net interest – recognised in net expenditure for the year	17	25
Actuarial loss / (gain) – in other comprehensive expenditure	120	39
Less benefits paid	(141)	(99)
Present value of scheme liabilities	1,421	1,425

Actuarial gains / losses to be recognised in other comprehensive income	2021–22 £000	2020–21 £000
Experience loss / (gain) arising on the scheme liabilities	74	(24)
Changes in assumptions underlying the present value of the scheme liabilities	46	63
Net total actuarial loss / (gain) in other comprehensive expenditure	120	39

Experience loss arising on the scheme liabilities amounted to £74,000 (a £24,000 gain in 2020–21), changes in the demographic and financial assumptions underlying the valuation of the scheme have resulted in a loss to the scheme of £46,000 (a £63,000 loss in 2020–21).

The total re-measurements were a loss of £120,000 (a £39,000 loss in 2020–21) recognised directly in taxpayers' equity.

Experience loss / (gain) as a percentage of scheme liabilities	2021–22 £000	2020–21 £000
Experience loss / (gain) arising on the scheme liabilities	74	(24)
Net present value of the scheme liabilities	1,421	1,425
Percentage of scheme liabilities at the year end	5.21	(1.70)

The sensitivity analysis of Scheme Liabilities defined benefit obligations (DBO) to changes in the significant actuarial assumptions (keeping all other assumptions unchanged) indicates the following:

		%	£000
Rate of discounting scheme liabilities	+ 0.5% a year	-4%	(63)
Rate of increase in CPI	+ 0.5% a year	+5%	69
Life expectancy – each member assumed 1 year younger than their actual age		+4%	50

Opposite changes in assumptions to those above would produce approximately equal and opposite changes in the DBO. Similarly, doubling the changes in the assumptions will produce approximately double the changes in the DBO. The sensitivities show the changes in each assumption in isolation. In practice, such assumptions rarely change in isolation and given the interdependencies between them, the impacts may offset to some extent.

The longevity assumptions used in the valuation of the scheme are detailed in the table below:

Life expectancy at retirement

Current pensioners	Exact age	31 March 2022		31 March 2021	
		Men Years	Women Years	Men Years	Women Years
	60	27.0	28.6	26.9	28.6
	65	22.1	23.8	22.0	23.7

13 Commitments under leases

Total future minimum lease payments under operating leases are given below.

Obligations under operating leases comprise	31 March 2022 £000	31 March 2021 £000
Premises leases		
Not later than one year	443	601
Later than one year but not later than five years	336	426
Total	779	1,027

Buildings are occupied under rental agreements or a memorandum of terms of occupation with other government bodies; all with a definite end date. No other leases are currently held.

From 1 April 2022 accounting standard IFRS16 will be applied to the recognition of all leases. The impact of this is provided in policy note 1.14

14 Capital commitments

Significant commitments	31 March 2022 £000	31 March 2021 £000
Fit-out of new London office (completion Q1 2022–23)	45	333
Completion of ICT infrastructure upgrade	-	60
Total	45	393

15 Contingent liabilities disclosed under IAS 37

There were no contingent liabilities on 31 March 2022 (none on 31 March 2021).

16 Related party transactions

The EHRC is a non-departmental public body sponsored by the Cabinet Office which is regarded as a related party. During the year funding of £17.115 million was received for the Cabinet Office in the form of grant-in-aid. No other significant transactions have taken place.

The EHRC leases premises managed by the Government Property Agency (GPA), an executive agency of the Cabinet Office and has made payments to the GPA in respect of rent and other costs associated with the leases. Transactions have also taken place with other Government departments in the normal performance of EHRC's functions.

The EHRC does not have any subsidiaries.

No board member or manager has undertaken any material transactions with the EHRC during the reporting period except for remuneration and re-imbursment of expenses incurred which is reported on pages 59–66.

17 Events after the reporting period

There were no events between the Statement of Financial Position date and the date the accounts were authorised for issue.

Authorised for issue

The accounts have been authorised for issue by the Accounting Officer on the same date as the Comptroller and Auditor General's Audit Certificate.

Contacts

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